

1 L. LIN WOOD, P.C.
2 L. Lin Wood (admitted pro hac vice)
lwood@linwoodlaw.com
3 Nicole J. Wade (admitted *pro hac vice*)
nwade@linwoodlaw.com
4 Jonathan D. Grunberg (admitted *pro hac vice*)
jgrunberg@linwoodlaw.com
5 G. Taylor Wilson (admitted *pro hac vice*)
twilson@linwoodlaw.com
6 1180 West Peachtree Street, Ste. 2040
Atlanta, Georgia 30309
7 404-891-1402
404-506-9111 (fax)
8
9

CHATHAM LAW GROUP
Robert Christopher Chatham
chris@chathamfirm.com
CA State Bar No. 240972
3109 W. Temple St.
Los Angeles, CA 90026
213-277-1800
WEISBART SPRINGER HAYES, LLP
Matt C. Wood (admitted *pro hac vice*)
mwood@wshllp.com
212 Lavaca Street, Ste. 200
Austin, TX 78701
512-652-5780
512-682-2074 (fax)

10 *Attorneys for Plaintiff Vernon Unsworth*

11
12 QUINN EMANUEL URQUHART &
SULLIVAN, LLP
13 Alex B. Spiro (admitted *pro hac vice*)
alexspiro@quinnmanuel.com
14 51 Madison Avenue, 22nd Floor
New York, New York 10010
15 Telephone: (212) 849-7000
16
17

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Robert M. Schwartz (Bar No. 117166)
robertschwartz@quinnmanuel.com
Michael T. Lifrak (Bar No. 210846)
michaellifrak@quinnmanuel.com
Jeanine M. Zalduendo (Bar No. 243374)
jeaninezalduendo@quinnmanuel.com
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017-2543

18 *Attorneys for Defendant Elon Musk*

19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

VERNON UNSWORTH,
Plaintiff,
vs.
ELON MUSK,
Defendant.

Case No. 2:18-cv-08048
Judge: Hon. Stephen V. Wilson
**JOINT AMENDED
TRIAL EXHIBIT LIST**
Pretrial Conference: Dec. 2, 2019
Trial Date: Dec. 3, 2019

1 Pursuant to Federal Rule of Civil Procedure 26(a)(3) and Local Rule 16-6,
2 Plaintiff Vernon Unsworth and Defendant Elon Musk, hereby jointly submit the
3 Amended Trial Exhibit List, attached as Exhibit A, removing certain exhibits and
4 altering Dr. Jansen's documents based upon the Court's rulings, and adding certain
5 publicly available documents.

6 The parties reserve the right to use at trial: (a) exhibits to be used solely for
7 impeachment pursuant to F.R. Civ. P. 26(a)(3)(A)(iii) and Local Rule 16-2.3; (b)
8 exhibits obtained through trial subpoenas or otherwise produced after the date of this
9 filing; and (c) documents the need for which could not reasonably have been
10 anticipated in advance of trial.

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 Dated: December 2, 2019

2 **L. LIN WOOD, P.C.**
3 L. Lin Wood
4 Nicole J. Wade
5 Jonathan D. Grunberg
6 G. Taylor Wilson

7 **WEISBART SPRINGER HAYES, LLP**
8 Matt C. Wood

9 **CHATHAM LAW GROUP**
10 Robert Christopher Chatham

11 By: /s/L. Lin Wood
12 L. Lin Wood
13 *Attorneys for Plaintiff Vernon Unsworth*

14 **QUINN EMANUEL URQUHART**
15 **& SULLIVAN, LLP**
16 Alex Spiro
17 Robert M. Schwartz
18 Michael T. Lifrak
19 Jeanine M. Zalduendo

20 By: /s/Alex Spiro
21 Alex Spiro
22 *Attorneys for Defendant Elon Musk*

EXHIBIT A

Exhibit No.	Description	Objections	Date Identified	Date Admitted
1 (D)	Complaint for Defamation	P: <ul style="list-style-type: none">• Relevance• FRE 403		
2 (D)	Plaintiff Vernon Unsworth's Responses and Objections to Elon Musk's First Set of Interrogatories			
3 (D)	Plaintiff Vernon Unsworth's Verification of Responses; Elon Musk's First Set of Interrogatories			
4 (P*) (D)	Photographs of Unsworth	D: <ul style="list-style-type: none">• Relevance (non-rescue pictures)		
5 (D)	Extraction diagram by Vernon Unsworth	P: <ul style="list-style-type: none">• Relevance• Misleading		
6 (D)	Article: An Inside Story of the Tham Luang Cave Rescue with Vernon Unsworth	P: <ul style="list-style-type: none">• Hearsay• Relevance		
7 (D)	BCCT Multi-Chambers Chiang Mai Business Networking - Q&A session from British diving expert Vernon Unsworth	P: <ul style="list-style-type: none">• Hearsay• Relevance		
8 (D)	Email from Vernon Unsworth to Adam Fellows re Description			
10 (P*) (D)	Photograph of Unsworth			
11 (D)	Tweet from Elon Musk			
12 (D)	Tweet from Elon Musk			
13 (P*) (D)	Vernon Unsworth CNN Interview (Video)			
14 (P*) (D)	Vernon Unsworth CNN Interview (Video)			
15 (D)	Email from Vernon Unsworth to Mark Stephens			

Exhibit No.	Description	Objections	Date Identified	Date Admitted
16 (D)	Tweet from Elon Musk			
17 (D)	Report: Situational Analysis of the Commercial Sexual Exploitation of Children, Thailand	P: <ul style="list-style-type: none">• Hearsay• Relevance• Prejudice• Misleading		
18 (D)	Tweet from Elon Musk			
19 (P*) (D)	Tweet from Elon Musk			
20 (D)	Tweet from Elon Musk			
21 (P*) (D)	L. Wood letter to E. Musk			
22 (P*) (D)	Tweet from Elon Musk			
23 (D)	BuzzFeed News Article “In A New Email Elon Musk Accused A Caver Of Being A ‘Child Rapist’ And Said He ‘Hopes’ There’s A Lawsuit”			
24 (D)	Vernon Unsworth Time Interview (Video)			
25 (D)	Article: British cave diver considering legal action over Elon Musk's 'pedo' attack	P: <ul style="list-style-type: none">• Hearsay• Relevance• Prejudice		
26 (D)	Vernon Unsworth Interview (Video)			
27 (D)	Article: British caver says he approached by U.S., British lawyers over Musk's comments	P: <ul style="list-style-type: none">• Hearsay		
28 (D)	Article: Hero British diver Vernon Unsworth responds as Elon Musk revives 'paedo' claim	P: <ul style="list-style-type: none">• Foundation• Hearsay		
29 (D)	Vernon Unsworth BBC Interview (Video)	P: <ul style="list-style-type: none">• Relevance		
30 (P*) (D)	News18 Article “British Diver Who Sued Elon Musk Over ‘Pedo Guy’ Insult Makes it to UK Honours List”	P: <ul style="list-style-type: none">• Hearsay		

	Exhibit No.	Description	Objections	Date Identified	Date Admitted
1	31 (P*) (D)	BuzzFeed News Article “The Cave Rescuer Elon Musk Called A ‘Pedo’ Has Lawyered Up And Is Preparing A Libel Claim”	D: <ul style="list-style-type: none">• Hearsay		
2	33 (D)	Facebook page in Thai with English translation	P: <ul style="list-style-type: none">• Authenticity• Foundation• Hearsay• Relevance• Prejudice• Misleading		
3	34 (P*)	Article: The Inside Story “Getting the Boys Out” Tham Luang Cave Rescue	D: <ul style="list-style-type: none">• Hearsay• Foundation		
4	35 (P*)	Email Teller and Musk re: Apology	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
5	36 (P*) (D)	Email Birchall and Howard re: NDA	P: <ul style="list-style-type: none">• Hearsay		
6	37 (P*) (D)	LLW Letter to Musk			
7	38 (P) (D)	Musk Tweets (version containing all three successive tweets)			
8	39 (P*) (D)	Musk Tweet beginning “As this well-written article suggests...”			
9	40 (P*) (D)	Musk Tweet re: “Bet ya a signed dollar it’s true”			
10	41 (P*) (D)	Musk Tweet in response to Drew Olanoff beginning “You don’t think it’s strange...”			
11	42 (P) (D)	Email Mac and Musk re: Child Rapist and Child Bride			
12	45 (P*)	Financial Times Article “Elon Musk’s weakness for self-promotion masks his potential”	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403		
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					

	Exhibit No.	Description	Objections	Date Identified	Date Admitted
1	46 (P*) (D)	Cave Survey			
2	47 (D)	WhatsApp chat printout	P: • Hearsay		
3	48 (P*) (D)	Photo of Tube			
4	49 (P*)	Email Musk and Branson re: accusations	D: • Hearsay • Relevance		
5	50 (P*)	Texts Unsworth and Vanessa Unsworth	D: • Hearsay • Foundation • Relevance • FRE 602 • FRE 403		
6	51 (D)	Email from Vernon Unsworth to Adam Fellows re Watch "Hero "ຖາລາວ"thailand" on YouTube	P: • Relevance		
7	52 (P*) (D)	Woranan ("Tik") Ratrawiphakkun ID card	D: • Foundation		
8	53 (D)	Facebook page in Thai with English translation	P: • Authenticity • Foundation • Hearsay • Relevance • Prejudice • Misleading		
9	54A (D)	Photo	P: • Relevance		
10	54B (D)	Photo	P: • Relevance		
11	54C (D)	Photo	P: • Relevance		
12	54D (D)	Photo	P: • Relevance		
13	54E (D)	Photo	P: • Relevance		
14	54F (D)	Photo	P: • Relevance		
15	54G (D)	Photo	P: • Relevance		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
54H (D)	Photo	P: <ul style="list-style-type: none">• Relevance		
54I (D)	Photo	P: <ul style="list-style-type: none">• Relevance		
54J (D)	Photo	P: <ul style="list-style-type: none">• Relevance		
55 (D)	Document in Thai	P: <ul style="list-style-type: none">• Authenticity• Hearsay• Relevance• Prejudice• Misleading		
56 (P*) (D)	Messaging Heltsley and Harris re: Rescue	P: <ul style="list-style-type: none">• Hearsay		
57 (P*) (D)	Tube Specifications	P: <ul style="list-style-type: none">• Hearsay		
58 (P*) (D)	WhatsApp Chat	P: <ul style="list-style-type: none">• Hearsay		
59 (P*) (D)	WhatsApp Chat	P: <ul style="list-style-type: none">• Hearsay		
60 (D)	Email Musk and Bowman re: Rescue	P: <ul style="list-style-type: none">• Hearsay		
61 (P*) (D)	Email Mac, Musk, Teller, Birchall re: BuzzFeed Request for Comment	P: <ul style="list-style-type: none">• Hearsay D: <ul style="list-style-type: none">• FRE 403• FRE 602• Foundation		
62 (P*) (D)	Email Howard, Musk, Ortiz, Teller re: Investigation	P: <ul style="list-style-type: none">• Hearsay		
63 (P*)	BuzzFeed News Article “Elon Musk Has Always Been At War With The Media”	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403		
64 (P*) (D)	Email Howard and Birchall re: Investigation	P: <ul style="list-style-type: none">• Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	65 (P*) (D)	Email Howard and Birchall re: Investigation	P: • Hearsay		
3	66 (P*) (D)	Email Howard and Birchall re: Investigation	P: • Hearsay D: • FRE 403 • Relevance • FRE 404		
4	67 (P*) (D)	Texts Howard and Birchall re: Investigation	P: • Hearsay • Relevance • FRE 403		
5	68 (P*) (D)	Email Howard and Birchall re: Investigation	P: • Hearsay		
6	69 (P*) (D)	Tweets by Ryan Mac	D: • Hearsay • Relevance • FRE 403		
7	70 (D)	Email Mac, Musk, Birchall re: Request for Comment	P: • Hearsay		
8	71 (P*) (D)	Email Birchall and Howard re: Investigation	P: • Hearsay		
9	72 (P*) (D)	Email Howard and Birchall re: Investigation	P: • Hearsay		
10	73 (P*) (D)	Email Howard and Birchall re: Investigation	P: • Hearsay • Relevance • FRE 403		
11	74 (P*) (D)	Email Howard and Birchall re: Investigation	P: • Hearsay		
12	75 (P*) (D)	Email Howard and Birchall re: Investigation	P: • Hearsay		
13	77 (P*) (D)	Email Teller, Zaveri, Gleeson, O'Brien, Behrend re: Press Inquiry	P: • Hearsay		
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	78 (P*)	Email Teller, Davis, Juncosa re: Cave Rescue	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403• FRE 602		
3	79 (P) (D)	Email Martin, Hardy, Teller, O'Brien, Arnold re: Press Inquiry	P: <ul style="list-style-type: none">• Hearsay		
4	80 (P) (D)	Email Otto and Tesla Comms. Re: Press Coverage	P: <ul style="list-style-type: none">• Hearsay D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
5	81 (P)	Email Arnold and Higgins re: Press Inquiry	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
6	82 (P)	Email Riley and Arnold re: Press Inquiry	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
7	83 (P)	Email Selk, SpaceX media, Tesla media, Arnold etc. re: Press Inquiry	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
8	84 (P)	Email Teller, Arnold, Hardy, O'Brien, Martin re: Press Inquiry	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
9	85 (P*)	Musk Tweet re: Media	D: <ul style="list-style-type: none">• Relevance• FRE 403		
10	86 (P*)	Email Musk and Branson re: Accusations	D: <ul style="list-style-type: none">• Foundation• Hearsay• FRE 403• Relevance		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	88 (P*)	Email Davis, Musk, Teller re: Cave Rescue	D: • Foundation • Hearsay (Osotthanakorn statement)		
3	89 (P*)	Email Teller, Balajadia, Members of Press re: Cave Rescue			
4	90 (P*)	Email Teller and Musk re: Investor Response	D: • Foundation • Hearsay • Relevance • FRE 403		
5	91 (P)	Email Musk and Teller re: Apology	D: • Foundation • Hearsay • Relevance • FRE 403		
6	92 (P)	Email O'Brien, Teller, Maron, Arnold, Gleeson, Chen re: Press Coverage	D: • Foundation • Hearsay • Relevance • FRE 403		
7	93 (P*)	Email Teller, Glover, O'Brien re: Press Coverage	D: • Foundation • Hearsay • Relevance • FRE 403		
8	94 (P*)	Email Arnold, Norman, Musk, Teller re: Press Coverage/Inquiry	D: • Hearsay • Foundation • FRE 403		
9	95 (P*)	Email Schmidbaur, Teller, Tesla Press, Zillis, O'Brien, SpaceX Media, Arnold et. al re: Press Coverage	D: • Foundation • Hearsay • Relevance • FRE 403		
10	96 (P*)	Email Nesbitt, Glover, Musk, Arnold, Teller re: Accusations	D: • Foundation • Hearsay • Relevance • FRE 403		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	97 (P*) (D)	Email Caplan and Davis re: Cave Rescue	P: <ul style="list-style-type: none">• Hearsay D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
3	98 (P*)	Texts Davis and Musk re: Cave Rescue			
4	99 (P*)	Texts Davis and Teller re: Cave Rescue	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
5	100 (P*)	Texts Davis and Teller re: Cave Rescue	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
6	101 (P)	Tweets @elonmusk & @GossiTheDog			
7	102 (P*)	Email Musk and Davis re: Cave Rescue			
8	103 (P*)	Email Musk, Davis, Teller re: Cave Rescue	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
9	104 (P*)	Texts Arnold and O'Brien re: Accusations	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
10	106 (P)	Email Chen and Tesla Comm. Re: Press Coverage	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
11	123 (D)	Article: Elon Musk to go to trial over 'pedo' tweet about British diver Vernon Unsworth	P: <ul style="list-style-type: none">• Hearsay		
12	124 (D)	Article: A British Cave Rescuer Is Officially Suing Elon Musk For Calling Him A Pedophile	P: <ul style="list-style-type: none">• Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	125 (D)	Article: Elon Musk hits back against lawsuit by caver he called a 'pedo guy'	P: <ul style="list-style-type: none">• Hearsay		
3	126 (D)	The Society of Professional Journalists' Code of Ethics	P: <ul style="list-style-type: none">• Hearsay		
4	127 (D)	Vernon Unsworth Google search results	P: <ul style="list-style-type: none">• Hearsay		
5	128 (D)	Lin Wood Tweet	P: <ul style="list-style-type: none">• Relevance• Hearsay		
6	129 (D)	Lin Wood Tweet	P: <ul style="list-style-type: none">• Relevance• Hearsay		
7	130 (D)	Lin Wood Tweet	P: <ul style="list-style-type: none">• Relevance• Hearsay		
8	133 (P*)	Jansen CV	D: <ul style="list-style-type: none">• Hearsay		
9	134 (P*)	Jansen List of Testimony	D: <ul style="list-style-type: none">• Hearsay		
10	136 (D)	Jansen List of Articles Containing Defaming Statements	<ul style="list-style-type: none">•		
11	139 (P*) (D)	Jansen Retainer Agreement			
12	140 (P*) (D)	Jansen Invoice			
13	141 (P*) (D)	Jansen Invoice			
14	142 (P*) (D)	Jansen Time and Expense Sheet			
15	143 (D)	Letter agreement between Bernard (Jim) Jansen and Quinn Emanuel	P: <ul style="list-style-type: none">• Relevance		
16	144 (D)	Letter agreement between Bernard (Jim) Jansen and Quinn Emanuel	P: <ul style="list-style-type: none">• Relevance		
17	145 (D)	printout re foxnews.com website performance			

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	146 (D)	Jansen Spreadsheet	P: <ul style="list-style-type: none">• Completeness•		
3	147 (D)	Article: The Internet is Mostly Bots	P: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• Prejudice• Misleading		
4	148 (D)	printout from cars.com	P: <ul style="list-style-type: none">• Relevance		
5	149 (D)	Article: The Week in Tesla News: Snoozing on Autopilot, Musk 'Deletes' Twitter and the EV Evolution			
6	150 (D)	Article: How Accurate Are Website Traffic Estimators?			
7	151 (D)	Article: Find Out How Much Traffic a Website Gets: 3 Ways Compared	P: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• Prejudice• Misleading		
8	152 (D)	Article: Elon Musk Calls Thai Cave Diver Hero A 'Child Rapist' As He Escalates Baseless Feud			
9	153 (D)	Article: If You're Calling Someone a 'Pedo' on Twitter, Elon Musk, It's Time to Take a Long, Hard Look at Your Life			
10	200 (P)	Musk Tweet re "signed dollar" responding to @GossiTheDog stating "pedo"			
11	201 (P)	Musk Tweet re: purported apology beginning with "As this well-written article suggests" replying to @adamchavez	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
12	202 (P)	Musk Tweet re: "strange he hasn't sued me" with comments			
13	203 (P*)	Email Howard and Birchall re: Investigation			

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	204 (P*)	Google Results for “James Howard Jupiter” “Before Aug 15, 2018”	D: <ul style="list-style-type: none">• Not provided• Authenticity• Foundation• FRE 602		
3	205 (P*)	Daily Echo Article “Businessman stole £426,000 from company’s accounts despite being given ‘numerous second changes’”	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
4	206 (P*)	Email Musk and Glover re: Accusations	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
5	208 (P*)	BuzzFeed News Article “People Really Aren’t Here for Elon Musk’s Rescue Submarine”	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
6	209 (P*)	BuzzFeed News Article “Elon Musk Didn’t Help Save The Thai Boys. Now He’s Attacking Someone Who Did”	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
7	210 (P*)	BuzzFeed News Article “Elon Musk Has Revisited His Baseless Pedophile Claims”	D: <ul style="list-style-type: none">• Hearsay• FRE 403 (re SEC)		
8	211 (P*)	BuzzFeed News article “The Cave Rescuer Elon Musk Called A ‘Pedo’ Has Lawyered Up And Is Preparing A Libel Claim”	D: <ul style="list-style-type: none">• Hearsay		
9	212 (P)	Musk Google Alerts	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403• FRE 602		
10	213 (P)	Musk Google Alerts	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403• FRE 602		

1 Exhibit 2 No.	3 Description	4 Objections	5 Date 6 Identified	7 Date 8 Admitted
214 (P)	Musk Google Alerts	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403• FRE 602		
215 (P)	Musk Google Alerts	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403• FRE 602		
216 (P)	Musk Google Alerts	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403• FRE 602		
217 (P)	Musk Google Alerts	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403• FRE 602		
218 (P)	Musk Google Alerts	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403• FRE 602		
219 (P)	Musk Google Alerts	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403• FRE 602		
220 (P)	Musk Google Alerts	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403• FRE 602		
221 (P)	Musk Google Alerts	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403• FRE 602		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	222 (P)	Musk Google Alerts	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403• FRE 602		
3	223 (P)	Quora Article "What's the full story behind Elon Musk's involvement with the Thai cave rescue effort?"	D: <ul style="list-style-type: none">• Foundation• Hearsay• Relevance• FRE 403		
4	224 (P*)	Dkt. 30 – Musk's Notice of Motion and Motion to Dismiss Plaintiff Vernon Unsworth's Complaint; Memorandum of Points and Authorities	D: <ul style="list-style-type: none">• Relevance• FRE 403		
5	225 (P*)	Dkt. 45 – Defendant Elon Musk's Answer to Plaintiff's Complaint	D: <ul style="list-style-type: none">• Relevance• FRE 403		
6	226 (P*)	Email Gleeson, Teller, Lee re: Cave Rescue	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403		
7	227 (P*)	Email Teller to various reporters re: Cave Rescue			
8	228 (P*)	Email O'Brien, Tesla Comms., and Liddle re: Press Coverage	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403		
9	229 (P*)	Email LLW PC to Musk			
10	230 (P*)	Email LLW PC to Musk			
11	231 (P*)	Email LLW PC to Musk			
12	232 (P*)	Musk Tweet "This reaction has shaken my opinion of many people...."			
13	233 (P*)	Email Birchall and Howard re: Investigation			
14	234 (P*)	Email Birchall and Howard re: Investigation			
15	235 (P*)	Email Birchall and Howard re: Investigation			
16	236 (P*)	Email Birchall and Howard re: Investigation			

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	237 (P*)	Email Birchall and Howard re: Investigation			
3	238 (P*)	Email Birchall and Howard re: Investigation			
4	239 (P*)	Email Rive and Musk re: Cave Rescue			
5	241 (P*)	Email Jeremy Arnold, Teller, Musk, Davis re: Quora Article	D: • Hearsay • Relevance • FRE 403		
6	242 (P*)	Email Arnold, Teller, Norman, Birchall re: Quora post	D: • Hearsay • Relevance • FRE 403		
7	243 (P*)	Email Teller and Arnold re: Quora post	D: • Hearsay • Relevance • FRE 403		
8	244 (P*)	Email Musk and Thailand Team re: Cave Rescue			
9	245 (P*)	Email Yu, Musk, Ortiz re: Cave Rescue			
10	246 (P*)	Email Harris, Musk, Teller, and Thailand Team re: Cave Rescue			
11	247 (P*)	Email Stanton and Musk re: Cave Rescue			
12	248 (P*)	Email Stanton and Musk re: Cave Rescue			
13	249 (P*)	Text Musk re: Cave Rescue			
14	250 (P*)	Musk Tweet re: Cave Rescue			
15	251 (P*)	Email Musk and Eby re: Cave Rescue			
16	252 (P*)	Musk Tweets re: Cave Rescue			
17	253 (P*)	Email Musk, Teller, Birchall, Arnold re: Press Inquiry	D: • Hearsay • Foundation • Relevance • FRE 403		
18	254 (P*)	Email Musk and Schwartz re: Accusations			
19	256 (P*)	Email Davis, Teller et al. re: Cave Rescue			

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	257 (P*)	Email Davis to Thailand Team re: Cave Rescue			
3	258 (P*)	AIG Policy (subject to meet and confer)	D: • FRE 403 • Stipulation • FRE 411		
4	259 (P*)	AIG Declarations Page (subject to meet and confer)	D: • FRE 403 • Stipulation • FRE 411		
5	260 (P*)	Musk Tweet re: Cave Rescue			
6	261 (P*)	Musk Tweet re: Cave Rescue			
7	262 (P*)	Musk Tweets re: Cave Rescue			
8	263 (P*)	Musk Tweet re: Cave Rescue			
9	264 (P*)	Musk Tweets re: Cave Rescue			
10	265 (P*)	Musk Tweets re: Cave Rescue			
11	266 (P*)	Musk Tweet re: Cave Rescue			
12	267 (P*)	Musk Tweet re: Cave Rescue			
13	268 (P*)	Musk Tweet re: Cave Rescue			
14	269 (P*)	Musk Tweet re: Cave Rescue			
15	270 (P*)	Musk Tweet re: Cave Rescue			
16	271 (P*)	Musk Tweet re: Cave Rescue			
17	272 (P*)	Musk Tweets re: Cave Rescue			
18	273 (P*)	Musk Tweets re: Cave Rescue			
19	274 (P*)	Loup Ventures "An Open Letter to Elon Musk"	D: • Hearsay • Foundation • Relevance • FRE 403		
20					
21					
22					
23					
24					
25					
26					
27					
28					

	Exhibit No.	Description	Objections	Date Identified	Date Admitted
1	275 (P*)	Fortune Article "After Elon Musk's 'Pedo'; Tweet, Tesla Shares Fall 4% as Some Investors Worry About His Erratic Behavior"	D: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• FRE 403		
2	276 (P*)	Business Insider Article "One of Tesla's largest shareholders is urging Elon Musk to simmer down and focus after a tumultuous few weeks"	D: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• FRE 403		
3	277 (P*)	Bloomberg Article "'The Last Bet-the-Company Situation': Q&A With Elon Musk"	D: <ul style="list-style-type: none">• Relevance• FRE 403		
4	278 (P*)	Musk Tweet re "taking Tesla private ..."	D: <ul style="list-style-type: none">• Relevance• FRE 403• Motion In Limine• FRE 404		
5	279 (P*)	Email Mac and Musk re: Accusations/Cave Rescue			
6	280 (P*)	Email Birchall and Howard re: Investigation			
7	281 (P*)	Email Davis, Musk, Thailand Team re: Cave Rescue			
8	282 (P*)	Email Davis, Dunn, Musk re: Cave Rescue			
9	283 (P*)	Email Davis, Bowman et al. re: Cave Rescue			
10	284 (P*)	Cave Survey from The Guardian			
11	285 (P)	Email Mitchell and Arnold re: Press Inquiry	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403		
12	286 (P)	Email Higgins and Arnold re: Press Inquiry	D: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• FRE 403		
13	287 (P)	Email re: Press Inquiry	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403		

1 Exhibit No.	2 Description	3 Objections	4 Date Identified	5 Date Admitted
288 (P)	Arnold and Mumtaz re: Press Inquiries	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403		
289 (P)	Email Levin, Arnold, O'Brien et al. re: Press Inquiry	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403		
290 (P*)	Email Arnold and O'Brien re: Press Coverage	D: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• FRE 403		
291 (P*)	Email O'Brien and Tesla Comms. re: complaints	D: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• FRE 403		
292 (P*)	Email O'Brien, Chen, Arnold re: Press Coverage	D: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• FRE 403		
293 (P*)	Email O'Brien and Arnold re: Press Inquiry	D: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• FRE 403		
294 (P*)	Email Arnold, Delaville, O'Brien et al. re: Press Coverage	D: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• FRE 403		
296 (P*)	Email Glover, Arnold, Musk, Teller, O'Brien, Antonini re: BuzzFeed Accusations	D: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• FRE 403 (statements by others)		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	297 (P*)	Email Arnold, Tay, Antonini re: Press Coverage	D: • Hearsay • Foundation • Relevance • FRE 403		
3	298 (P*)	Email Arnold and Tesla Comms. re: Press Inquiries	D: • Relevance • FRE 403		
4	299 (P*)	Email Arnold and Teller re: Press Inquiry	D: • Hearsay • Foundation • Relevance • FRE 403		
5	300 (P*)	Email with Photo of Unsworth			
6	301 (P*)	Photo of Unsworth			
7	302 (P*)	Photo of Unsworth			
8	303 (P*)	Photo of Unsworth			
9	304 (P*)	Photo of Unsworth			
10	305 (P*)	Email Ellis and Unsworth re: Cave Rescue			
11	306 (P*)	Email Unsworth re: Cave Survey			
12	307 (P*)	Cave Survey with handwritten notes			
13	308 (P*)	Emails Stanton and Musk re: Cave Rescue			
14	309 (P*)	Emails Stanton and Musk re: Cave Rescue			
15	310 (P*)	Emails Stanton and Musk re: Cave Rescue			
16	311 (P*)	Emails Stanton and Musk re: Cave Rescue			
17	312 (P*)	Emails Stanton and Musk re: Cave Rescue			
18	313 (P*)	Emails Stanton and Musk re: Cave Rescue			
19	314 (P*)	Emails Stanton and Musk re: Cave Rescue			
20	315 (P*)	Emails Stanton and Musk re: Cave Rescue			

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	316 (P*)	Emails Stanton and Musk re: Cave Rescue			
3	317 (P*)	Email Lever and Unsworth re: MBE			
4	318 (P*)	Email Unsworth and Blanch re: Investiture			
5	319 (P*)	Email re: Commendation			
6	320 (P*)	Email Unsworth and Thai Embassy re: Immigration Records	D: • Foundation • Hearsay		
7	321 (P*)	Email Unsworth and Harris re: Documentary			
8	322 (P*)	Cave Surveys and Notes			
9	323 (P*)	Cave Photograph			
10	324 (P*)	Photograph of Unsworth			
11	325 (P*)	Unsworth Passport (reserving right to enter actual passport)			
12	326 (P*)	Photograph of Unsworth			
13	327 (P*)	Photograph of Unsworth			
14	328 (P*)	Video of Cave Rescue/Unsworth	D: • Relevance • FRE 403		
15	329 (P*)	Tik ID	D: • Foundation		
16	330 (P*)	Unsworth Passport			
17	331 (P*)	Photos of tube			
18	332 (P*)	Cave Survey			
19	333 (P*)	Text Unsworth and Vanessa Unsworth	D: • Hearsay • Foundation • Relevance • FRE 403		
20	334 (P*)	Email Teller, Musk, Davis re: Cave Rescue			
21	335 (P*)	Email Musk and Shotwell re: Cave Rescue			

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	336 (P*)	Email Musk and Shotwell re: Cave Rescue			
3	337 (P*)	Email Musk re: Cave Rescue			
4	338 (P*)	Email Stubbings and Musk re: Cave Rescue	D: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• FRE 403		
5	339 (P*)	Email Glover and Hilton file titled “Email_Glover_Hilton re Elon’s pedo comment” (produced by Ridgley Walsh)	D: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• FRE 403		
6	340 (P*)	Email Glover, Arnold, Teller, Musk file titled “Email_Glover_Teller re 60 Mins” (produced by Ridgley Walsh)	D: <ul style="list-style-type: none">• Hearsay• Relevance• FRE 403		
7	362 (P*)	Tesla Form 8-K dated November 5, 2013	D: <ul style="list-style-type: none">• Relevance• FRE 403• Hearsay		
8	364 (P*)	Tesla Records Custodian Declaration			
9	365 (P*)	Boring Company Records Custodian Declaration			
10	366 (P*)	SpaceX Records Custodian Declaration			
11	367 (P*)	Unsigned Agency Agreement			
12	368 (P*)	The Tham Luang Cave Rescue – A Personal Account by Martin Ellis	D: <ul style="list-style-type: none">• Hearsay• Foundation• Authenticity• Relevance• FRE 403		
13	369 (P*)	Email Howard and Birchall re: Investigation			
14	370 (P*)	Email Howard and Birchall re: Investigation			
15	371 (P*)	Email Teller and Musk re: Media Contact			
16	372 (P*)	Email Teller, Birchall, Musk re: Press Inquiry			

Exhibit No.	Description	Objections	Date Identified	Date Admitted
373 (P*)	Email Musk and Benson re: Flint	D: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• FRE 403		
374 (P*)	Musk Google Alerts	D: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• FRE 403		
375 (P*)	Musk Google Alerts	D: <ul style="list-style-type: none">• Hearsay• Relevance		
376 (P*)	Musk Google Alerts	D: <ul style="list-style-type: none">• Hearsay• Relevance		
377 (P*)	Email Musk to Musk re: Tweet	D: <ul style="list-style-type: none">• Hearsay• Relevance		
378 (P*)	List of Ongoing Litigation	D: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• FRE 403		
380 (P*)	Text Musk and Teller			
381 (P*)	Text Musk and Davis			
382 (P*)	Text Musk and Harris			
383 (P*)	Text Musk and O'Brien			
385 (P*)	Text Musk and Grimes	D: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• FRE 403		
386 (P*)	Email Reymenants and Davis			
387 (P*)	Email Glover, Hilton, Felten (Produced by Ridgley Walsh)	D: <ul style="list-style-type: none">• Hearsay• Foundation• Relevance• FRE 403		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	388 (P*)	Ridgley Walsh Records Certification executed by Glover			
3	389 (P*)	Musk Twitter Profile	D: • Relevance • Hearsay		
4	390 (P*)	Musk Twitter Profile			
5	391 (P*)	Musk Twitter Profile			
6	397 (P*)	Email T. Wilson to M. Lifrak Re: SERVICE – Unsworth v. Musk, Case no. 2:18-cv-08048-SVW-JC – Initial Disclosures	D: • Relevance • FRE 403		
7	398 (P*)	Declaration of Jared Birchall	D: • Foundation • Relevance • Work Product • Hearsay • FRE 403		
8	399 (P*)	Defendant's Privilege Log	D: • Foundation • Relevance • Work Product • Hearsay • FRE 403		
9	400 (P*)	Articles Referenced in Dr. Jansen Report	D: • Hearsay		
10	401 (P*)	Reuters Article “Elon Musk shows off ‘kid-sized submarine’ he thinks can help in Thai cave rescue”	D: • Hearsay		
11	402 (P*)	Interesting Engineering Article “Elon Musk Drops off ‘Kid-Size’ Submarine to Help Rescue Thai Soccer Team From the Cave”	D: • Hearsay		
12	403 (P*)	Newsweek Article “Elon Musk Shocked by Thai Cave Backlash: ‘Something’s Messed Up if This is Not a Good Thing’”	D: • Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	404 (P*)	Dezeen Article “Elon Musk rebuffs claims tiny submarine was impractical for cave rescue”	D: <ul style="list-style-type: none">• Hearsay		
3	405 (P*)	The New York Times Article “Elon Musk Defends His Rejected Mini-Sub Plan for Thai Cave”	D: <ul style="list-style-type: none">• Hearsay		
4	406 (P*)	YouGov Article “World’s most admired 2019”	D: <ul style="list-style-type: none">• Hearsay		
5	407 (P*)	Time Article “Time 100: The Most Influential People of 2018”	D: <ul style="list-style-type: none">• Hearsay		
6	408 (P*)	Time Article “Elon Musk Is on the 2018 Time 100 List”	D: <ul style="list-style-type: none">• Hearsay		
7	409 (P*)	Business Insider South America Article “Elon Musk (46) the 25th most influential person in the world”	D: <ul style="list-style-type: none">• Hearsay		
8	410 (P*)	The New York Times Article “Divers in Thailand Scour Cave for Missing Soccer Team and Coach”	D: <ul style="list-style-type: none">• Hearsay		
9	411 (P*)	The New York Times Article “Soccer Team Is Found Alive in Thailand Cave Rescue”	D: <ul style="list-style-type: none">• Hearsay		
10	412 (P*)	The New York Times Article “Thailand Cave Rescue Turns to How to Extract Trapped Soccer Team”	D: <ul style="list-style-type: none">• Hearsay		
11	413 (P*)	The New York Times Article “Thai Cave Rescue Will Be a Murky and Desperate Ordeal, Divers Say”	D: <ul style="list-style-type: none">• Hearsay		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
414 (P*)	The New York Times Article “4 Team Members Are Out of Thailand Cave, With 9 to Go”	D: <ul style="list-style-type: none">• Hearsay		
415 (P*)	The New York Times Article “How Rescuers in a Thai Cave Pulled Off the Impossible”	D: <ul style="list-style-type: none">• Hearsay		
416 (P*)	The New York Times Article “‘Still Can’t Believe It Worked’: The Story of the Thailand Cave Rescue”	D: <ul style="list-style-type: none">• Hearsay		
417 (P*)	Bloomberg Businessweek Article “When Elon Musk Tried to Destroy Tesla Whistleblower Martin Tripp”	D: <ul style="list-style-type: none">• Hearsay		
418 (P*)	Elon Musk Tweets responding to @zeynep and @elonmusk (“pedo guy”)	D: <ul style="list-style-type: none">• Hearsay		
419 (P*)	New York Times Article “What Elon Musk Should Learn From the Thailand Cave Rescue”	D: <ul style="list-style-type: none">• Hearsay		
420 (P*)	Elon Musk Tweet responding to @zeynep (“pedo guy”) from Vox Article “Elon Musk just called one of the Thai cave rescuers a pedophile”	D: <ul style="list-style-type: none">• Hearsay		
421 (P*)	Elon Musk Tweet responding to @GossiTheDog (“bet ya a signed dollar it’s true) from Time Magazine	D: <ul style="list-style-type: none">• Hearsay		
422 (P*)	Archived Elon Musk with tweets from @zeynep and @elonmusk	D: <ul style="list-style-type: none">• Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	423 (P*)	Twitter thread with tweets from @zeynep and @elonmusk	D: <ul style="list-style-type: none">• Hearsay		
3	424 (P*)	Gizmodo Article “Is Elon Musk Serious?”	D: <ul style="list-style-type: none">• Hearsay		
4	425 (P*)	The New Republic Article “Is Elon Musk’s ‘kid-sized submarine’ a gimmick?”	D: <ul style="list-style-type: none">• Hearsay		
5	426	RNZ News Article “Why was Elon Musk at the Thai cave rescue?”	D: <ul style="list-style-type: none">• Hearsay		
6	427 (P*)	Dr. Jansen Amended Expert Report	D: <ul style="list-style-type: none">• Hearsay• Foundation• FRE 403		
7	428 (P*)	Appendix D to Dr. Jansen Amended Expert Report – Links to Articles	D: <ul style="list-style-type: none">• Hearsay		
8	429 (P*)	Appendix E to Dr. Jansen Amended Expert Report – Google Trends Graphs	D: <ul style="list-style-type: none">• Hearsay		
9	430 (P*)	Appendix f to Dr. Jansen Amended Expert Report – Cites to Supporting and Supplementary Documents	D: <ul style="list-style-type: none">• Hearsay		
10	431 (P*)	Appendix G to Dr. Jansen Amended Expert Report – List of Countries	D: <ul style="list-style-type: none">• Hearsay		
11	432 (P*)	Dr. Jansen Amended Spreadsheet – Working Papers	D: <ul style="list-style-type: none">• Hearsay		
12	500 (D)	PIA reprimands Burgess Wreford & Unsworth	P: <ul style="list-style-type: none">• Hearsay• Relevance• Prejudice		
13	501 (D)	Mark Stephens Tweet: Hip Hip Hoo Ray @Buzzfeed	P: <ul style="list-style-type: none">• Hearsay• Relevance• Prejudice		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	502 (D)	Article: Media lawyers: Why Donald Trump is unlikely to sue in UK or US over 'dirty dossier' media revelations	P: <ul style="list-style-type: none">• Hearsay• Relevance• Prejudice		
3	503 (D)	Article: Buzzfeed seeks court order forcing Press Gazette to release confidential journalistic material	P: <ul style="list-style-type: none">• Hearsay• Relevance• Prejudice		
4	504 (D)	Article: A Media Lawyer Says There Will Be A Huge "Chilling Effect" From The Daily Mail's Libel Payout To Melania Trump	P: <ul style="list-style-type: none">• Hearsay• Relevance• Prejudice		
5	505 (D)	Email from John Paczkowski to Dave Arnold re story on NLRB charges	P: <ul style="list-style-type: none">• Relevance• Hearsay		
6	506 (D)	Email from Caroline O'Donovan to Dave Arnold re response to worksafe report?	P: <ul style="list-style-type: none">• Relevance• Hearsay		
7	507 (D)	Email from Caroline O'Donovan to Dave Arnold re nlrb complaint response	P: <ul style="list-style-type: none">• Relevance• Hearsay		
8	508 (D)	BuzzFeed News Standards and Ethics Guide	P: <ul style="list-style-type: none">• Relevance• Prejudice• Confusion		
9	509 (D)	Email from Caroline O'Donovan to Dave Arnold re comment on elon's tweet?	P: <ul style="list-style-type: none">• Relevance• Hearsay		
10	510 (D)	Email from Caroline O'Donovan to Gina Antonini; Dave Arnold re cuts to salaried employees?	P: <ul style="list-style-type: none">• Relevance• Hearsay		
11	511 (D)	Article: Heavy rains frustrate search for teen soccer team trapped in Thai cave	P: <ul style="list-style-type: none">• Relevance• Hearsay		
12	512 (D)	Article: As Search for Thai Boys Lost in Cave Hits Day 5, a Nation Holds Its Breath	P: <ul style="list-style-type: none">• Relevance• Hearsay		
13	513 (D)	British Cave Explorer Joins Search for Missing Thai Soccer Team (Transcript)	P: <ul style="list-style-type: none">• Relevance		
14	514 (D)	British Cave Explorer Joins Search for Missing Thai Soccer Team (Video)	P: <ul style="list-style-type: none">• Relevance		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
515 (D)	Article: Thai cave rescuers try another entry point to find trapped soccer team	P: <ul style="list-style-type: none">• Relevance• Hearsay		
516 (D)	BBC ຝ່ານທີ່ນກຳ ວັດສົມທະ... - ບົບພໍາໄທຍ່ - BBC Thai (Video)	P: <ul style="list-style-type: none">• Relevance		
517 (D)	Crews Search Thai Cave for Missing Teens (Transcript)	P: <ul style="list-style-type: none">• Relevance		
518 (D)	Crews Search Thai Cave for Missing Teens (Video)	P: <ul style="list-style-type: none">• Relevance		
519 (D)	Article: 7 days in the dark: Time is running out for teenage soccer team	P: <ul style="list-style-type: none">• Relevance• Hearsay		
520 (D)	Article: 9 days of hell: Inside the race to save a soccer team trapped in a cave	P: <ul style="list-style-type: none">• Relevance• Hearsay		
521 (D)	Article: Thailand Cave Rescue Turns to How to Extract Trapped Soccer Team	P: <ul style="list-style-type: none">• Relevance• Hearsay		
522 (D)	Article: British caver is hailed a 'magician' after convincing Thai officials to bring in heroic UK divers who found stranded schoolboys, aided by his knowledge of the tunnels	P: <ul style="list-style-type: none">• Relevance• Hearsay		
523 (D)	Elon Musk Tweet: Boring Co has advanced ground penetrating radar & is pretty good at digging holes. Don't know if pump rate is limited by electric power or pumps are too small. If so, could dropship fully charged Powerpacks and pumps.	P: <ul style="list-style-type: none">• Hearsay		
524 (D)	Elon Musk Tweet: I suspect that the Thai govt has this under control, but I'm happy to help if there is a way to do so	P: <ul style="list-style-type: none">• Hearsay		
525 (D)	Email from Elon Musk to Steve Davis re Is there anything we could do short notice?	P: <ul style="list-style-type: none">• Hearsay		
526 (D)	Email from Elon Musk to Steve Davis; Jared Birchall re Flint, Michigan	P: <ul style="list-style-type: none">• Hearsay		
527 (D)	Mine Rescue Document	P: <ul style="list-style-type: none">• Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	528 (D)	Elon Musk Tweet: Maybe worth trying: insert a 1m diameter nylon tube (or shorter set of tubes for most difficult sections) through cave network & inflate with air like a bouncy castle. Should create an air tunnel underwater against cave roof & auto-conform to odd shapes like the 70cm hole.			
3	529 (D)	Email from Sam Teller to Elon Musk; Steve Davis re Rescue help	P: • Hearsay		
4	530 (D)	Article: Thailand cave rescue: Ex-navy diver dies on oxygen supply mission	P: • Hearsay		
5	531 (D)	Elon Musk Tweet: Building double-layer Kevlar pressure pods with Teflon coating to slip by rocks & front/rear rope tow hitch & lead pockets for neutral buoyancy. ~60 cm oval. Testing this airt in a pool with a subject who has never done SCUBA. Do the divers think something like this might work?	P: • Hearsay		
6	532 (D)	Elon Musk Tweet: Does you know output voltage & amperage of those generator trucks? 3 phase? What frequency? Will need high voltage transformer to carry power over distance or very thick cable. Beyond that, only batteries will work. Will prep Powerwalls in case needed.			
7	533 (D)	Elon Musk Tweet: Looks like 1st bit of water is close enough to entrance to be pumped out. 2nd & 3rd would need battery packs, air pumps & tubes. If depth of 2nd is accurate, would need ~0.5 bar tube pressure. Prob need to enter tube, zip up & then transit.	P: • Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	534 (D)	Elon Musk Tweet: Prob wise to add an air tank (butt end fwd to take impacts) in nose of pod & vent valve in rear. Set air tank to slow bleed rate, then no need for SCUBA mouthpiece or regulator. Training unnecessary & less susceptible to panic attack.	P: <ul style="list-style-type: none">• Hearsay		
3	535 (D)	Elon Musk Tweet: Should be possible to increase the air inflow rate above the leak rate, unless there is a very big hole. If oxygen % is dropping, suggests that leak holes are not large.	P: <ul style="list-style-type: none">• Hearsay		
4	536 (D)	Elon Musk Tweet: SpaceX & Boring Co engineers headed to Thailand tomorrow to see if we can be helpful to govt. There are probably many complexities that are hard to appreciate without being there in person.	P: <ul style="list-style-type: none">• Hearsay		
5	537 (D)	Elon Musk Tweet: Yeah, that's what I'm talking about in that tweet — double-layer Kevlar pressure pod with Teflon coating. Other approach is a long inflatable air sock. Both worth trying.	P: <ul style="list-style-type: none">• Hearsay		
6	538 (D)	Email from Andrew Branagh to Charlie Notthoff; Steve Davis; Michael Altenhofen re info	P: <ul style="list-style-type: none">• Relevance		
7	539 (D)	Email from Elissa Butterfield to Sam Teller; Steve Davis re Thai cave tube: Zero-force zipper solution	P: <ul style="list-style-type: none">• Relevance• Hearsay		
8	540 (D)	Email from Elon Musk to Chris Bowman re Thai soccer team rescue	P: <ul style="list-style-type: none">• Hearsay		
9	541 (D)	Email from Elon Musk to Lyndon Rive re Thailand Dive Rescue	P: <ul style="list-style-type: none">• Hearsay		
10	542 (D)	Email from Elon Musk to Zach Dunn re Thai Support	P: <ul style="list-style-type: none">• Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	543 (D)	Email from James Gleeson to Begona Blanco Munoz; SpaceX Media Relations; Yazhou Sun et al. re CNN International Interview Enquiry - Elon Musk	P: <ul style="list-style-type: none">• Hearsay		
3	544 (D)	Email from Lyndon Rive to Elon Musk re Thailand	P: <ul style="list-style-type: none">• Hearsay		
4	545 (D)	Email from Nuttapon Nakarach to Steve Davis; Sam Teller; Jonathan Hofeller et al. re Rescue help	P: <ul style="list-style-type: none">• Hearsay		
5	546 (D)	Email from Sam Teller to Dave Arnold; Evelyn Tay; Steve Davis re Elon Musk, Concerning Thailand Rescue 12 Boys	P: <ul style="list-style-type: none">• Hearsay		
6	547 (D)	Email from Sam Teller to David O'Gorman; Will Draffin; Elisa Butterfield et al. re TONIGHT / Flight to Thailand	P: <ul style="list-style-type: none">• Hearsay		
7	548 (D)	Email from Sam Teller to Elon Musk re Underwater surveying			
8	549 (D)	Email from Steve Davis to Florence Li; Christopher Bowman; Christopher Wallden et al. re Rescue help	P: <ul style="list-style-type: none">• Hearsay		
9	550 (D)	Email from Steve Davis to Sam Teller; Vincent Werner; Florence Li et al. re Internal distro	P: <ul style="list-style-type: none">• Hearsay		
10	551 (D)	Email from Steve Davis to Thailand re Pod and Tube update	P: <ul style="list-style-type: none">• Hearsay		
11	552 (D)	Elon Musk Tweet: 4 handles/hitch points on front & 4 on rear. 2 air tank connections on front & 2 on rear, allowing 1 to 4 tanks simultaneously connected, all recessed for impact protection w secondary cap seal if leak develops.	P: <ul style="list-style-type: none">• Hearsay		
12	553 (D)	Elon Musk Tweet: Construction complete in about 8 hours, then 17 hour flight to Thailand	P: <ul style="list-style-type: none">• Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	554 (D)	Elon Musk Tweet: Continue to be amazed by the bravery, resilience & tenacity of kids & diving team in Thailand. Human character at its best.	P: <ul style="list-style-type: none">• Relevance		
3	555 (D)	Elon Musk Tweet: Extremely talented dive team. Makes sense given monsoon. Godspeed.	P: <ul style="list-style-type: none">• Relevance		
4	556 (D)	Elon Musk Tweet: Fitted for a kid or small adult to minimize open air. Segmented compartments to place rocks or dive weights & adjust buoyancy.	P: <ul style="list-style-type: none">• Hearsay		
5	557 (D)	Elon Musk Tweet: Got more great feedback from Thailand. Primary path is basically a tiny, kid-size submarine using the liquid oxygen transfer tube of Falcon rocket as hull. Light enough to be carried by 2 divers, small enough to get through narrow gaps. Extremely robust.	P: <ul style="list-style-type: none">• Hearsay		
6	558 (D)	Elon Musk Tweet: Some good feedback from cave experts in Thailand. Iterating with them on an escape pod design that might be safe enough to try. Also building an inflatable tube with airlocks. Less likely to work, given tricky contours, but great if it does.	P: <ul style="list-style-type: none">• Hearsay		
7	559 (D)	Elon Musk Tweet: Will do. Even if not useful here, perhaps it will be in a future situation.			
8	560 (D)	Email from Andrew Liptak to James Gleeson; SpaceX Media Relations re Request for Comment: Escape Pod	P: <ul style="list-style-type: none">• Hearsay		
9	561 (D)	Email from Armor Harris to Thailand re Notes from Chat with Ben Reymenants (Diver on Site)	P: <ul style="list-style-type: none">• Hearsay		
10	562 (D)	Email from Brandon Hahn to Steve Davis; Shakes; Matt Chambers et al. re Thailand survey	P: <ul style="list-style-type: none">• Hearsay		

	Exhibit No.	Description	Objections	Date Identified	Date Admitted
1	563 (D)	Email from Elon Musk to EMDesk re Thailand soccer team rescue: Conditions now "most suitable" but monsoon threatens	P: <ul style="list-style-type: none">• Hearsay		
2	564 (D)	Email from Elon Musk to Sam Teller re Thailand	P: <ul style="list-style-type: none">• Hearsay		
3	565 (D)	Email from Jake Maxwell Watts to James Gleeson; SpaceX Media Relations re Wall Street Journal -- urgent deadline	P: <ul style="list-style-type: none">• Hearsay• Cumulative		
4	566 (D)	Email from James Gleeson to Jake Maxwell Watts; SpaceX Media Relations re Wall Street Journal -- urgent deadline	P: <ul style="list-style-type: none">• Hearsay• Cumulative		
5	567 (D)	Email from Robin Sielert to Mike Kato; Dave Lua; Nuttapon Nakarach et al. re SpaceX contract	P: <ul style="list-style-type: none">• Hearsay• Cumulative		
6	568 (D)	Elon Musk Tweet: A second one that is 30cm shorter is almost complete	P: <ul style="list-style-type: none">• Hearsay		
7	569 (D)	Elon Musk Tweet: According to divers who have made the journey, this is capable of maneuvering through all passages	P: <ul style="list-style-type: none">• Hearsay		
8	570 (D)	Elon Musk Tweet: According to divers who have made the passage, yes. However, we also made an exact replica that is inflatable, so that the entire path can be tested without risk of blockage.	P: <ul style="list-style-type: none">• Hearsay		
9	571 (D)	Elon Musk Tweet: Buoyancy adjusted by strapping diver weight belts around body of capsule. They're prevented from sliding off by the 6 diver handhold attachments	P: <ul style="list-style-type: none">• Hearsay		
10	572 (D)	Elon Musk Tweet: Design based on dive team feedback (primarily Stanton): 4 air / oxygen ports front & rear, front ports protected by nosecone. Dual O-ring seal on acrylic rear plate with clear view of occupant head. Leak/buckling proof to 10X cave water pressure.	P: <ul style="list-style-type: none">• Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	573 (D)	Elon Musk Tweet: Diver weight belts wrapped around outside. Mini-sub only weighs ~40kg dry, so easy to carry on long dry sections of cave, then add weight belts for wet sections.	P: <ul style="list-style-type: none">• Hearsay		
3	574 (D)	Elon Musk Tweet: Given Chiang Rai airport hours, soonest we could've departed US was an hour ago, but cave now closed for diver rescue. Will continue testing in LA in case needed later or for somewhere else in future.	P: <ul style="list-style-type: none">• Hearsay		
4	575 (D)	Elon Musk Tweet: It is an honor to work with them	P: <ul style="list-style-type: none">• Relevance		
5	576 (D)	Elon Musk Tweet: Mini-sub arriving in about 17 hours. Hopefully useful. If not, perhaps it will be in a future situation.	P: <ul style="list-style-type: none">• Hearsay		
6	577 (D)	Elon Musk Tweet: Pretty close. There is a nosecone on the front to protect against rocks impacting fwd air hoses with a hole on the side for hoses to exit.	P: <ul style="list-style-type: none">• Hearsay		
7	578 (D)	Elon Musk Tweet: Simulating maneuvering through a narrow passage	P: <ul style="list-style-type: none">• Hearsay		
8	579 (D)	Elon Musk Tweet: Thanks, but we've not done anything useful yet. It is all other people.	P: <ul style="list-style-type: none">• Relevance		
9	580 (D)	Elon Musk Tweet: Video	P: <ul style="list-style-type: none">• Hearsay		
10	581 (D)	Elon Musk Tweet: Yeah, that sounds cool. Music makes things better. Calms the mind. Adding padded wall pockets for a hand radio & phone/music player.	P: <ul style="list-style-type: none">• Hearsay		
11	582 (D)	Email from Elon Musk to Steve Davis; Zach Dunn re This Is Elon Musk	P: <ul style="list-style-type: none">• Hearsay		
12	583 (D)	Email from Sean Pitt to Michelle Monroe; SpaceX Media Relations re Associated Press media inquiry	P: <ul style="list-style-type: none">• Hearsay• Relevance		
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	584 (D)	Email from Will Heltsley to Zach Dunn; Christopher Bowman; Vincent Werner et al. re pod documentation for discussion with govt officials, if required	P: <ul style="list-style-type: none">• Hearsay		
3	585 (D)	Email from Zach Dunn to Elon Musk; Thailand re This Is Elon Musk	P: <ul style="list-style-type: none">• Hearsay• Cumulative		
4	586 (D)	Email from Zach Dunn to Vincent Werner; Mark Concannon; Florence Li et al. re Pegasus	P: <ul style="list-style-type: none">• Hearsay• Relevance		
5	587 (D)	Submarine Test (Video)			
6	588 (D)	Submarine Test (Video)			
7	589 (D)	Email from Christopher Eby to Steve Davis; Thailand re Am about to enter China airspace. Please feel free to reply via SpaceX twitter.	P: <ul style="list-style-type: none">• Hearsay		
8	590 (D)	Email from James Gleeson to Nur-Azna Sanusi re REUTERS REQUEST PERMISSION TO USE WING INFLATABLES IMAGES	P: <ul style="list-style-type: none">• Hearsay		
9	591 (D)	Email from James Gleeson to Sam Teller re Q's for WIRED story on Thai cave rescue	P: <ul style="list-style-type: none">• Hearsay		
10	592 (D)	Email from Yazhou Sun to James Gleeson; SpaceX Media Relations re CNN International Interview Enquiry - Elon Musk	P: <ul style="list-style-type: none">• Hearsay		
11	593 (D)	Lin Wood Tweet: There are so many incredibly heroic and good people in the world....	P: <ul style="list-style-type: none">• Relevance• Hearsay		
12	594 (D)	Article: Meet the seven British divers playing leading roles in the Thai cave rescue mission	P: <ul style="list-style-type: none">• Hearsay		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
595 (D)	Elon Musk Tweet: Good for rescuing vulnerable patients in dangerous environments, particularly if water, toxic gas or dangerous bacteria/viruses present, as patient would remain dry & at std air pressure entire time.	P: <ul style="list-style-type: none">• Hearsay		
596 (D)	Elon Musk Tweet: Great news that they made it out safely. Congratulations to an outstanding rescue team!	P: <ul style="list-style-type: none">• Relevance		
597 (D)	Elon Musk Tweet: Just returned from Cave 3. Mini-sub is ready if needed. It is made of rocket parts & named Wild Boar after kids' soccer team. Leaving here in case it may be useful in the future. Thailand is so beautiful.	P: <ul style="list-style-type: none">• Hearsay		
598 (D)	Elon Musk Tweet: Moreover, based on extensive cave video review & discussion with several divers who know journey, SpaceX engineering is absolutely certain that mini-sub can do entire journey & demonstrate at any time.	P: <ul style="list-style-type: none">• Hearsay		
599 (D)	Email from Armor Harris to Thailand re U.S. Embassy Bangkok/U.S. Commercial Service Thailand	P: <ul style="list-style-type: none">• Hearsay		
600 (D)	Email from James Gleeson to Michelle Monroe; SpaceX Media Relations; Sean Pitt re Associated Press media inquiry	P: <ul style="list-style-type: none">• Hearsay		
601 (D)	Email from James Gleeson to Yazhou Sun; SpaceX Media Relations re CNN International Interview Enquiry - Elon Musk	P: <ul style="list-style-type: none">• Hearsay		
602 (D)	Elon Musk Tweet: Glad to hear that. Engineering team also getting feedback from the British dive team on how to improve the design for future applications.	P: <ul style="list-style-type: none">• Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	603 (D)	Elon Musk Tweet: This reaction has shaken my opinion of many people. We were asked to create a backup option & worked hard to do so. Checked with dive team many times to confirm it was worthwhile. Now it's there for anyone who needs it in future. Something's messed up if this is not a good thing.	P: • Hearsay		
3	604 (D)	Elon Musk Tweet: Yes. Caves are now filled with water again. Difficulty of passage is massively dependent on water level. Little kids can walk/swim in when low, but it can be deadly to pro divers when high. Pump & generator engineering team deserves some credit for the rescue.	P: • Hearsay		
4	605 (D)	Email from Chris Bowman to Christopher Bowman re Pegasus	P: • Hearsay • Relevance		
5	606 (D)	Email from Christopher Wallden to James Gleeson; Armor Harris; Sam Teller re Thailand Cave Rescue PBS NOVA	P: • Hearsay		
6	607 (D)	Email from Sam Teller to DL- USComms re Thai cave rescue: Elon Musk's plan to help involved a mini-submarine — Vox	P: • Hearsay • Relevance		
7	608 (D)	Text from Unknown to Elon Musk re British cave team	P: • Hearsay		
8	609 (D)	Article: "This is madness": A rescue diver on what it was like to save the Thai boys in the cave	P: • Hearsay		
9	610 (D)	Elon Musk Tweet: The pumps I saw were running v high flow rate all the way from cave 3. They stopped shortly after boys were rescued & water level rose to roof level all way back to cave 1. That was great work.	P: • Hearsay		

	Exhibit No.	Description	Objections	Date Identified	Date Admitted
1	611 (D)	Email from Elon Musk to Keith Cowing re Tired of @ElonMusk/@SpaceX rescue bashing	P: <ul style="list-style-type: none">• Hearsay		
2	612 (D)	Email from Sam Teller to Alexander Davies; James Gleeson; SpaceX Media Relations; W D re Q's for WIRED story on Thai cave rescue	P: <ul style="list-style-type: none">• Hearsay		
3	613 (D)	Article: 'Time is running out': Inside the treacherous rescue of boys trapped in a Thai cave	P: <ul style="list-style-type: none">• Hearsay		
4	614 (D)	Article: British diver recalls Thai cave rescue: 'Are we heroes? No'	P: <ul style="list-style-type: none">• Hearsay		
5	615 (D)	Email from James Gleeson to Sam Teller; Steve Davis; Sean Pitt re CNN: Cave rescuer slams Elon Musk's submarine idea			
6	616 (D)	Article: Elon Musk 'Can Stick His Submarine Where It Hurts,' Says Diver in Thai Cave Rescue	P: <ul style="list-style-type: none">• Hearsay		
7	617 (D)	Article: Elon Musk 'can stick his submarine where it hurts' says British diver who helped Thai cave rescue	P: <ul style="list-style-type: none">• Hearsay		
8	618 (D)	Email from Google Alerts to Elon Musk re Google Alert - Elon musk			
9	619 (D)	Email from Katherine Chan to Sarah O'Brien re CNN Facebook, Cave rescuer slams Elon Musk's submarine idea			
10	620 (D)	Article: Exclusive interview with Thai cave rescue hero Vernon Unsworth: 'If the Brits hadn't been called in, it would have been too late'	P: <ul style="list-style-type: none">• Hearsay		
11	621 (D)	Email from Julia Wong to Elon Musk re Accusing diver of being a pedophile	P: <ul style="list-style-type: none">• Hearsay		
12	622 (D)	Email from Press to Sam Teller re Request for response to British diver's comments re: Thai cave rescue submarine idea			

Exhibit No.	Description	Objections	Date Identified	Date Admitted
623 (D)	Email from Remy Smidt to SpaceX Media Relations re BuzzFeed News: Request for comment			
624 (D)	Total views of an article published on buzzfeednews.com			
625 (D)	Article: Elon Musk And British Diver Exchange Harsh Words Over Thai Cave Rescue	P: • Relevance		
626 (D)	Email from Avi Selk to SpaceX Media Relations; Press@tesla.com re Seeking comment on Musk "pedo" comments and fallout			
627 (D)	Email from Elon Musk to Elon Musk re Tweet by Walter M. on Twitter	P: • Hearsay • Prejudice • Misleading		
628 (D)	Email from Google Alerts to jehn@boringcompany.com re Google Alert - elon musk	P: • Hearsay • Relevance		
629 (D)	Email from James Gleeson to David Harris; Tim Hughes re Thai tweets			
630 (D)	Mark Stephens Tweet: British cave diver considering legal action over Elon Musk's (utterly false) 'pedo' Twitter attack	P: • Hearsay • Relevance		
631 (D)	PPTV ເປດໄຈ “ເວັນ ອນສເວຣດ” ກລູແຈສາດຄູກາຮຈ່າຍ 13 ຂວາຕ - ເຂັມຂາວຄາ (Video)			
632 (D)	Total views of an article published on buzzfeednews.com			
633 (D)	Elon Musk Tweet: And mostly nobody mentioned the letter Elon got from Richard "Rick" Stanton, who IS a very experienced RESCUE DIVER. Stanton to Elon: "We're worried about the smallest lad please keep working on he capsule details" Y cnt @elonmusk share importnt concerns on his priv. Tw. acc?	P: • Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	634 (D)	Email from Erica Chen to Sarah O'Brien; Dave Arnold re Coverage on E's tweet			
3	635 (D)	Email from Philip Sherwell to Vernon Unsworth re The Sunday Times p2-3	P: <ul style="list-style-type: none">• Hearsay• Relevance		
4	636 (D)	Mark Stephens Tweet: Diver Who Helped Thai Boys May Sue Elon Musk After Billionaire Labelled Falsely Him A 'Pedo'	P: <ul style="list-style-type: none">• Relevance• Hearsay		
5	637 (D)	Ryan Mac Tweet: Elon Musk tries to apologize and admits he called the rescue diver a pedophile in anger, but not before he accuses him of lying. This is going to be red meat for the diver's lawyers.			
6	638 (D)	Article: Elon Musk and the Thai cave rescue: a tale of good intentions and bad tweets	P: <ul style="list-style-type: none">• Hearsay		
7	639 (D)	Article: Elon Musk apologizes for calling Thailand rescue diver a 'pedo'	P: <ul style="list-style-type: none">• Hearsay		
8	640 (D)	Email from Elon Musk to Mike Schwartz re Thank You	P: <ul style="list-style-type: none">• Hearsay		
9	641 (D)	Mark Stephens Tweet: Elon Musk apologises to diver for Twitter attack	P: <ul style="list-style-type: none">• Relevance• Hearsay		
10	642 (D)	Vernon Unsworth Instagram: Tham Luang Thailand Rescue	P: <ul style="list-style-type: none">• Hearsay• Relevance		
11	643 (D)	Elon Musk Tweet: I apologized. Do you stand by your guillotine statement or not?	P: <ul style="list-style-type: none">• Hearsay		
12	644 (D)	Email from Dave Arnold to Todd Maron; Sam Teller; Sarah O'Brien re he Daily Mail, EXCLUSIVE: 'Elon should be shot!' Mother of hero British caver says billionaire Musk needs his mouth taped up for calling her son 'pedo guy'			

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	645 (D)	Letter from Lieutenant General Sunai Praphuchanay to Elon Musk re Appreciation and Gratitude	P: <ul style="list-style-type: none">• Hearsay		
3	646 (D)	Email from Philip Sherwell to Vernon Unsworth re Letter from an ST reader	P: <ul style="list-style-type: none">• Hearsay• Relevance		
4	647 (D)	Email from Philip Sherwell to Vernon Unsworth re Vernon Unsworth	P: <ul style="list-style-type: none">• Hearsay• Relevance• Prejudice		
5	648 (D)	Email from Matt Gutman to Vernon Unsworth re Exploration - Tham Luang Monks Series	P: <ul style="list-style-type: none">• Hearsay		
6	649 (D)	Email from Matt Gutman to Vernon Unsworth re Tham Luang Cave	P: <ul style="list-style-type: none">• Relevance		
7	650 (D)	Email from Vernon Unsworth to Matt Gutman re Tham Luang Cave	P: <ul style="list-style-type: none">• Relevance		
8	651 (D)	Email from Vernon Unsworth to Matt Gutman re Video 2 Does this work better - Tham Luang Monks Series	P: <ul style="list-style-type: none">• Relevance		
9	652 (D)	Vernon Unsworth photo	P: <ul style="list-style-type: none">• Relevance• Cumulative		
10	653 (D)	Email from Elon Musk to Kimmy Hart Bennett re Defamation of Vernon Unsworth			
11	654 (D)	Email from Kimmy Hart Bennett to Elon Musk; Mark Stephens; Lin Wood re Defamation of Vernon Unsworth			
12	655 (D)	Email from Kimmy Hart Bennett to ElonMuskOffice; Mark Stephens; Lin Wood re Defamation of Vernon Unsworth			
13	656 (D)	Email from Kimmy Hart Bennett to ElonMuskOffice@SpaceX.com; Mark Stephens; Lin Wood re Defamation of Vernon Unsworth			

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	657 (D)	Email from Matt Gutman to Martin Ellis; Vernon Unsworth re your surveys	P: <ul style="list-style-type: none">• Hearsay• Relevance		
3	658 (D)	Email from Mark Stephens to Lin Wood; Taylor Wilson; Elizabeth Morley; Nikita Sellers re Vernon Unsworth	P: <ul style="list-style-type: none">• Hearsay• Relevance		
4	659 (D)	Email from Martin Ellis to Vernon Unsworth; Matt Gutman re your surveys	P: <ul style="list-style-type: none">• Hearsay• Relevance		
5	660 (D)	Email from James Brickhouse to Jupiter Military & Tactical Systems re Invoice Project Rowena	P: <ul style="list-style-type: none">• Hearsay		
6	661 (D)	Email from Vernon Unsworth to Mark Stephens; Elizabeth Morley; Nikita Sellers re This is Elon Musk	P: <ul style="list-style-type: none">• Hearsay		
7	662 (D)	Email from Vernon Unsworth to Mark Stephens; Elizabeth Morley; Nikita Sellers re This is Elon Musk	P: <ul style="list-style-type: none">• Hearsay		
8	663 (D)	Email from Vernon Unsworth to Mark Stephens; Elizabeth Morley; Nikita Sellers re This is Elon Musk	P: <ul style="list-style-type: none">• Hearsay		
9	664 (D)	Email from Vernon Unsworth to Mark Stephens; Elizabeth Morley; Nikita Sellers re This is Elon Musk	P: <ul style="list-style-type: none">• Hearsay		
10	665 (D)	Email from Vernon Unsworth to Mark Stephens; Elizabeth Morley; Nikita Sellers re This is Elon Musk	P: <ul style="list-style-type: none">• Hearsay		
11	666 (D)	Email from Vernon Unsworth to Mark Stephens; Elizabeth Morley; Nikita Sellers re This is Elon Musk	P: <ul style="list-style-type: none">• Hearsay		
12	667 (D)	Email from Vernon Unsworth to Mark Stephens; Elizabeth Morley; Nikita Sellers re This is Elon Musk	P: <ul style="list-style-type: none">• Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	668 (D)	Email from Vernon Unsworth to Mark Stephens; Elizabeth Morley; Nikita Sellers re This is Elon Musk	P: <ul style="list-style-type: none">• Hearsay		
3	669 (D)	Email from Jupiter Private to James Brickhouse re Project Rowena	P: <ul style="list-style-type: none">• Hearsay		
4	670 (D)	Email from Jupiter Private to James Brickhouse re Project Rowena	P: <ul style="list-style-type: none">• Hearsay		
5	671 (D)	Email from Werachon Sukondhapatipak to Steve Davis re Greeting from Thailand	P: <ul style="list-style-type: none">• Hearsay		
6	672 (D)	Email from Jupiter Military & Tactical Systems to Jim Brickhouse re Project Rowena	P: <ul style="list-style-type: none">• Hearsay		
7	673 (D)	Email from Jupiter Military & Tactical Systems to Jim Brickhouse re Jupiter's - Capability Statement	P: <ul style="list-style-type: none">• Hearsay		
8	674 (D)	Letter from Ambassador Virachai Plasai to Elon Musk re Deep Appreciation	P: <ul style="list-style-type: none">• Hearsay		
9	675 (D)	Email from Jupiter Military & Tactical Systems to Jim Brickhouse re Project Rowena	P: <ul style="list-style-type: none">• Hearsay		
10	676 (D)	Email from Jupiter Private to Jim Brickhouse re Project Rowena	P: <ul style="list-style-type: none">• Hearsay		
11	677 (D)	Vernon Unsworth Instagram: Back	P: <ul style="list-style-type: none">• Relevance		
12	678 (D)	Email from James Brickhouse to Jupiter Private re Project Rowena	P: <ul style="list-style-type: none">• Hearsay		
13	679 (D)	Article: Elon Musk Has Revisited His Baseless Pedophile Claims			
14	680 (D)	Drew Olanoff tweet string with Ryan Mac and Elon Musk			
15	681 (D)	Email from Elon Musk to Sam Teller; David Arnold re Has Elon investigated "pedophile" claims?	P: <ul style="list-style-type: none">• Hearsay		
16	682 (D)	Email from James Brickhouse to Jupiter Private re Target visit to 10 Downing Street	P: <ul style="list-style-type: none">• Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	683 (D)	Email from Sam Teller to Jared Birchall; Elon Musk re Has Elon investigated "pedophile" claims?	P: <ul style="list-style-type: none">• Hearsay		
3	684 (D)	Email from Charles Delaville to Dave Arnold; Caroline Nolan; Keely Sulprizio et al. re Reporters reaction to Elon's tweet	P: <ul style="list-style-type: none">• Hearsay		
4	685 (D)	Email from Dave Arnold to Russ Mitchell; Caroline Nolan re elon's at it again	P: <ul style="list-style-type: none">• Authenticity (incomplete email)• Hearsay		
5	686 (D)	Email from Eleanor Barker to Ben Smith; Ryan Mac re Elon Musk	P: <ul style="list-style-type: none">• Relevance• Hearsay		
6	687 (D)	Lin Wood Tweet: The British Diver Elon Musk Called A "Pedo" Threatened To Sue Him For Libel	P: <ul style="list-style-type: none">• Relevance• Hearsay		
7	688 (D)	Email from Elon Musk to Ryan Mac re Letters	P: <ul style="list-style-type: none">• Hearsay		
8	689 (D)	Email from Jupiter Military & Tactical Systems to Jim Brickhouse re Update from Thailand	P: <ul style="list-style-type: none">• Hearsay		
9	690 (D)	Email from Lin Wood to Ryan Mac re Quote	P: <ul style="list-style-type: none">• Relevance		
10	691 (D)	Email from Lin Wood to Ryan Mac re Defamation of Vernon Unsworth	P: <ul style="list-style-type: none">• Relevance		
11	692 (D)	Email from Lin Wood to Ryan Mac re Defamation of Vernon Unsworth	P: <ul style="list-style-type: none">• Relevance		
12	693 (D)	Email from Lin Wood to Ryan Mac re Defamation of Vernon Unsworth	P: <ul style="list-style-type: none">• Relevance		
13	694 (D)	Email from Ryan Mac to Lin Wood re Quote	P: <ul style="list-style-type: none">• Relevance• Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	695 (D)	Article: EXCLUSIVE: 'I am NOT a child bride! Hero British diver's FORTY-year-old girlfriend demolishes 'laughable' claims by billionaire Elon Musk that he 'is a paedophile who married a 12-year-old'	P: <ul style="list-style-type: none">• Hearsay		
3	696 (D)	Email from Ben Smith to Dave Arnold re BuzzFeed News: Elon	P: <ul style="list-style-type: none">• Hearsay		
4	697 (D)	Email from Dave Arnold to Elon Musk re Heads up: Buzzfeed article re: letter from Unsworth attorney	P: <ul style="list-style-type: none">• Hearsay		
5	698 (D)	Email from Dave Arnold to Juleanna Glover re BuzzFeed News: Elon	P: <ul style="list-style-type: none">• Hearsay		
6	699 (D)	Email from Dave Arnold to Ryan Mac re BuzzFeed News: Elon	P: <ul style="list-style-type: none">• Hearsay		
7	700 (D)	Email from Elon Musk to Juleanna Glover re BuzzFeed			
8	701 (D)	Email from Ryan Mac to Dave Arnold re BuzzFeed News: Elon	P: <ul style="list-style-type: none">• Hearsay		
9	702 (D)	Email from Ryan Mac to Lin Wood re Quote	P: <ul style="list-style-type: none">• Relevance• Hearsay		
10	703 (D)	Article: Elon Musk Calls Thailand Cave Diver a 'Child Rapist' in Angry Email			
11	704 (D)	Article: Elon Musk tells a reporter to 'stop defending child rapists' as he doubles down on attacking Thailand cave rescuer			
12	705 (D)	Email from James Brickhouse to Jupiter Private re Project Rowena	P: <ul style="list-style-type: none">• Hearsay		
13	706 (D)	Email from Jupiter Private to Jim Brickhouse re Project Rowena	P: <ul style="list-style-type: none">• Hearsay		
14	707 (D)	Email from Matt Gutman to Vernon Unsworth re a graph about you ...	P: <ul style="list-style-type: none">• Relevance• Hearsay• Prejudice		
15	708 (D)	Email from Lin Wood to Ryan Mac; Mark Stephens re Complaint filed	P: <ul style="list-style-type: none">• Relevance		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	709 (D)	Email from Ryan Mac to Dave Arnold re unsworth defamation suit	P: <ul style="list-style-type: none">• Hearsay		
3	710 (D)	Lin Wood Tweet: Vern Unsworth has taken the first step toward vindicating his good name. @elonmusk has been sued for defamation.	P: <ul style="list-style-type: none">• Relevance• Hearsay		
4	711 (D)	Article: Thai cave rescue diver sues Elon Musk for defamation over repeated 'pedo' comments			
5	712 (D)	Email from Lin Wood to Ryan Mac; Mark Stephens re Vernon Unsworth	P: <ul style="list-style-type: none">• Relevance• Hearsay		
6	713 (D)	Email from Elon Musk to Marc Benioff re Headlines...	P: <ul style="list-style-type: none">• Relevance• Hearsay		
7	714 (D)	The Boys in the Cave: Deep Inside the Impossible Rescue in Thailand, by Matt Gutman	P: <ul style="list-style-type: none">• Relevance• Waste of Time		
8	715 (D)	Text from Richard Harris to Vernon Unsworth	P: <ul style="list-style-type: none">• Relevance• Hearsay		
9	716 (D)	Miracle in the Cave: The 12 Lost Boys, Their Coach, and the Heroes Who Rescued Them, by Liam Cochrane	P: <ul style="list-style-type: none">• Hearsay• Waste of Time		
10	717 (D)	Article: Miracle At Tham Luang	P: <ul style="list-style-type: none">• Hearsay		
11	718 (D)	Email from Vernon Unsworth to Liam Cochrane; William Robinson re Your Book	P: <ul style="list-style-type: none">• Relevance• Hearsay• Prejudice		
12	719 (D)	Email from Philip Sherwell to Vernon Unsworth re Weekend story	P: <ul style="list-style-type: none">• Relevance• Hearsay		
13	720 (D)	Vernon Unsworth Instagram: Tham Sai Thong Cave	P: <ul style="list-style-type: none">• Relevance		
14	721 (D)	Email from Lin Wood to Ryan Mac; Mark Stephens re Musk motion to dismiss	P: <ul style="list-style-type: none">• Relevance• Hearsay		
15	722 (D)	Email from Ryan Mac to Lin Wood; Mark Stephens re Musk motion to dismiss	P: <ul style="list-style-type: none">• Relevance• Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	723 (D)	Article: New Year Honours 2019: Divers honoured for Thai cave rescue			
3	724 (D)	Article: British Cave Divers Receive Royal Honors			
4	725 (D)	Email from Lin Wood to Ryan Mac; Mark Stephens re checking in on Musk case	P: • Relevance • Hearsay		
5	726 (D)	Lin Wood Tweet: Fun fact: Unsworth's US lawyer is L Lin Wood, who is also representing Covington student Nick Sandmann in his lawsuit against the Washington Post.	P: • Relevance • Hearsay		
6	727 (D)	Lin Wood Tweet: Lawyers for Vernon Unsworth, the British cave rescuer that Elon Musk called a "pedo-guy," just filed a response in response to Musk's request that his defamation lawsuit be dismissed.	P: • Relevance • Hearsay		
7	728 (D)	Email from Lin Wood to Ryan Mac; Mark Stephens; Taylor Wilson re checking in on Musk case	P: • Relevance • Hearsay		
8	729 (D)	Lin Wood Tweet: Vernon Unsworth's opposition brief to Elon Musk's motion to dismiss directly addresses the issue of defamation on Twitter & the misconception that "opinion" has wholesale First Amendment protection. It does not. If interested in these issues, brief is a Musk read	P: • Relevance • Hearsay		
9	730 (D)	Email from Vernon Unsworth to Matt Gutman re Dear Sir - hello mate, just checking in	P: • Relevance • Prejudice • Hearsay		
10	731 (D)	Email from Ryan Mac to Lin Wood re court on Monday	P: • Relevance • Hearsay		
11	732 (D)	Email from Ryan Mac to Lin Wood re court on Monday	P: • Relevance • Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	733 (D)	Email from Ryan Mac to Lin Wood re denial of motion to dismiss	P: <ul style="list-style-type: none">• Relevance• Hearsay		
3	734 (D)	Lin Wood Tweet: Just notified that Elon Musk motion to dismiss Vernon Unsworth defamation case has been DENIED. Full order to be issued. Huge win as we move closer to achieving accountability for false accusations.	P: <ul style="list-style-type: none">• Relevance• Hearsay		
4	735 (D)	Chat text between Vernon Unsworth and Josh Morris	P: <ul style="list-style-type: none">• Relevance		
5	736 (D)	Lin Wood Tweet: "The significance of the ruling is clear: publication of accusations on Twitter does not provide a safe harbor for defamatory statements that are false and convey that they are factual."	P: <ul style="list-style-type: none">• Relevance• Hearsay		
6	737 (D)	Lin Wood Tweet: "To assert that Mr. Unsworth's reputation was not damaged by Musk's false accusations of pedophilia hints of desperation and ignores the fact that the law presumes damage in such cases."	P: <ul style="list-style-type: none">• Relevance• Hearsay		
7	738 (D)	Lin Wood Tweet: Elon Musk's "Twitter and opinion" defenses to Vernon Unsworth's defamation lawsuit legally misfired and he totally missed the target. Jury trial in October.	P: <ul style="list-style-type: none">• Relevance• Hearsay		
8	739 (D)	Email from Ryan Mac to Lin Wood re BuzzFeed News: In Atlanta	P: <ul style="list-style-type: none">• Relevance• Hearsay		
9	740 (D)	Email from Ryan Mac to Lin Wood re BuzzFeed News: In Atlanta	P: <ul style="list-style-type: none">• Relevance• Hearsay		
10	741 (D)	Article: British diver who helped rescued Thai football team from cave receives MBE at Buckingham Palace	P: <ul style="list-style-type: none">• Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	742 (D)	Email from Vernon Unsworth to Mark Stephens; Lin Wood; David Hooper et al. re Nice Work !	P: <ul style="list-style-type: none">• Relevance		
3	743 (D)	Email from Vernon Unsworth to Adam Fellows re Thamluang 24/6/61			
4	744 (D)	Email from Vernon Unsworth to Mark Stephens; David Hooper; Elizabeth Morley; Hugo Mason re Description			
5	745 (D)	Email from Vernon Unsworth to Adam Fellows re AP News: Diver who helped with Thai cave rescue sues Elon Musk	P: <ul style="list-style-type: none">• Hearsay		
6	746 (D)	Email from Vernon Unsworth to Adam Fellows re Functionality of the Musk Submarine from Video evidence	P: <ul style="list-style-type: none">• Hearsay		
7	747 (D)	Email from Vernon Unsworth to Adam Fellows re Musk's Pretty Tube			
8	748 (D)	Email from Vernon Unsworth to Adam Fellows re Thoughts from Bangkok	P: <ul style="list-style-type: none">• Hearsay• Relevance• Prejudice		
9	749 (D)	Email from Vernon Unsworth to Adam Fellows re Greetings	P: <ul style="list-style-type: none">• Hearsay• Relevance• Prejudice		
10	750 (D)	Email from Vernon Unsworth to Adam Fellows re Interview request for children's nonfiction book on the Wild Boars rescue	P: <ul style="list-style-type: none">• Hearsay• Relevance• Prejudice		
11	751 (D)	Email from Vernon Unsworth to Adam Fellows re KEVIN MACDONALD FEATURE DOCUMENTARY aka THAI CAVE RESCUE	P: <ul style="list-style-type: none">• Hearsay• Relevance• Prejudice		
12	752 (D)	Email from Vernon Unsworth to Adam Fellows re Thailand Kings Award - Tham Luang Cave Rescue	P: <ul style="list-style-type: none">• Hearsay• Relevance• Prejudice		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	753 (D)	Email from Vernon Unsworth to Adam Fellows re Bid for BBG News Podcast Beyond Today	P: <ul style="list-style-type: none">• Hearsay• Relevance• Prejudice		
3	754 (D)	Email from Vernon Unsworth to Adam Fellows re Greetings	P: <ul style="list-style-type: none">• Hearsay• Relevance• Prejudice		
4	755 (D)	Email from Vernon Unsworth to Adam Fellows re Vern - First Visit/Entry into Thailand July 2011	P: <ul style="list-style-type: none">• Hearsay• Relevance		
5	756 (D)	Email from Vernon Unsworth to Adam Fellows re Vern - Resume re Tham Luang Foreign Ministers Visit	P: <ul style="list-style-type: none">• Relevance		
6	757 (D)	Email from Vernon Unsworth to Adam Fellows re Welcome Letter for Mr. Unsworth, Vernon Harry			
7	758 (D)	Email from Ben Reymenants to Steve Davis re Cave rescue 3D mapper and rescue pod	P: <ul style="list-style-type: none">• Hearsay• Prejudice		
8	759 (D)	Email from Chris Bowman to Christopher Bowman re Cave Survey	P: <ul style="list-style-type: none">• Relevance		
9	760 (D)	Email from Chris Bowman to Christopher Bowman re Survey help	P: <ul style="list-style-type: none">• Relevance		
10	761 (D)	Email from Chris Bowman to Christopher Bowman re Tham Luang Rescue			
11	762 (D)	Email from Chris Bowman to Christopher Bowman re Tham Luang SpaceX survey data	P: <ul style="list-style-type: none">• Relevance• Hearsay		
12	763 (D)	Lin Wood Tweet: In Vernon Unsworth case, I deposed Elon Musk all day on Thursday in LA. When Musk deposition transcript & video are eventually filed with the Court, truth about Musk will be publicly revealed. The emperor has no clothes.	P: <ul style="list-style-type: none">• Relevance• Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	764 (D)	Email from Vernon Unsworth to Lin Wood; Mark Stephens; Taylor Wilson; Matt Wood re Ben Reymanants	P: <ul style="list-style-type: none">• Hearsay		
3	765 (D)	Email from Vernon Unsworth to Taylor Wilson; Lin Wood re Pedo comment	P: <ul style="list-style-type: none">• Hearsay		
4	766 (D)	BuzzFeed News Standards and Ethics Guide	P: <ul style="list-style-type: none">• Relevance• Prejudice		
5	767 (D)	Lin Wood Tweet: The tip of the iceberg.	P: <ul style="list-style-type: none">• Relevance• Hearsay		
6	768 (D)	Lin Wood Tweet: Elon Musk says 'pedo guy' tweet did not suggest British cave diver was a pedophile	P: <ul style="list-style-type: none">• Relevance• Hearsay		
7	769 (D)	Lin Wood Tweet: The man who was integral to saving the lives of 12 boys & their soccer coach — Vernon Unsworth, M.B.E.	P: <ul style="list-style-type: none">• Relevance• Hearsay		
8	770 (D)	Herbert du Plessis Tweet: Yes	P: <ul style="list-style-type: none">• Relevance• Foundation• Prejudice• Hearsay		
9	771 (D)	Hussein Badat Tweet: Probably a Pretoria Boys High thing. I was there fifteen years later and nothing would surprise me about that school. Apparently things have changed for the better since...	P: <ul style="list-style-type: none">• Relevance• Foundation• Prejudice• Hearsay		
10	772 (D)	John Thismyname Tweet: I have mates that were in his old highschool that use the phrase quite often. So perhaps it's just from that part.	P: <ul style="list-style-type: none">• Relevance• Foundation• Prejudice• Hearsay		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
773 (D)	Johurg lawyer Tweet: Yes it's true. It was used in the 705 and 805 when my brothers and I were at school and university. It was a mildly derogatory term for anyone who was irritating or who did something stupid. Mostly just limited to "pedo". Never meant as a word to accuse someone of paedophilia.	P: <ul style="list-style-type: none">• Relevance• Foundation• Prejudice• Hearsay		
774 (D)	Lin Wood Tweet: No, "pedo guy" is not a harmless South African slang term The Outline	P: <ul style="list-style-type: none">• Relevance• Hearsay		
775 (D)	miro Tweet: Was certainly used in the Sandton area in the 80's	P: <ul style="list-style-type: none">• Relevance• Foundation• Prejudice• Hearsay		
776 (D)	xsyn Tweet: I've heard it in some circles, ya.	P: <ul style="list-style-type: none">• Relevance• Foundation• Prejudice• Hearsay		
777 (D)	justfoodnow Tweet: I'm from the Western Cape but a good friend from Pretoria always uses it - usually when talking about a stupid/deadbeat/miserable person.	P: <ul style="list-style-type: none">• Relevance• Foundation• Prejudice• Hearsay		
778 (D)	Lin Wood Tweet: Elon Musk's Defense In 'Pedo Guy' Defamation Suit: Slur Meant Something E...	P: <ul style="list-style-type: none">• Relevance• Hearsay		
779 (D)	Ricky Bobby Tweet: Not that hard. Different words have different meanings depending on when and how they are used. For example, if I call someone a dickhole, obviously it is not meant literally, just means they are unpleasant to look at and be around. Same goes for "pedo"	P: <ul style="list-style-type: none">• Relevance• Foundation• Prejudice• Hearsay		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
780 (D)	xCountryRun Tweet: We joked about creepy old men hanging out around spooky places (called them Pedo's) - I had never heard of pedophile or there were transgender people (we called feminish boys pansy's — babies). In early days Pedo was a insult directed at car less poor whites	P: <ul style="list-style-type: none">• Relevance• Foundation• Prejudice• Hearsay		
781 (D)	James Howard UK Action Fraud Report	P: <ul style="list-style-type: none">• Foundation• Prejudice• Hearsay		
782 (D)	Email from Vernon Unsworth to Taylor Wilson re British Team, Thann Luang Rescue	P: <ul style="list-style-type: none">• Relevance• Hearsay		
783 (D)	Email from Vernon Unsworth to Taylor Wilson re Harry book - Tham Luang Deal	P: <ul style="list-style-type: none">• Relevance• Hearsay• Prejudice		
784 (D)	Email from Vernon Unsworth to Taylor Wilson re Our client - Vern Unsworth	P: <ul style="list-style-type: none">• Relevance• Hearsay• Prejudice		
785 (D)	Email from Vernon Unsworth to Taylor Wilson re Phuket News	P: <ul style="list-style-type: none">• Relevance• Hearsay• Prejudice		
786 (D)	Email from Vernon Unsworth to Taylor Wilson re The Cave - Tom Waller	P: <ul style="list-style-type: none">• Relevance• Hearsay• Prejudice		
787 (D)	Email from Vernon Unsworth to Taylor Wilson re Vern Unsworth	P: <ul style="list-style-type: none">• Relevance• Hearsay• Prejudice		
788 (D)	Email from Vernon Unsworth to Taylor Wilson re Vern Unsworth - more info	P: <ul style="list-style-type: none">• Relevance• Hearsay• Prejudice		
789 (D)	Email from Vernon Unsworth to Taylor Wilson re Vern Unsworth - Tham Luang Document	P: <ul style="list-style-type: none">• Relevance• Hearsay• Prejudice		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
790 (D)	Email from Vernon Unsworth to Taylor Wilson re Vern Unsworth / Guardian Weekend	P: <ul style="list-style-type: none">• Relevance• Hearsay• Prejudice		
791 (D)	Lin Wood Tweet: Vernon Unsworth's response to Elon Musk motion for summary judgment will be filed on Monday. It will be a detailed and fully-documented recital of the truth. Jury trial set for December 3.	P: <ul style="list-style-type: none">• Relevance• Hearsay		
792 (D)	Lin Wood Tweet: Mr. Unsworth was first informed 2 days ago that Cooley, LLP was also representing Elon Musk in September 2018 in connection with the Vernon Unsworth matter.	P: <ul style="list-style-type: none">• Relevance• Hearsay		
793 (D)	Lin Wood Tweet: Musk's attorney, Alex Spiro, fails to disclose that Musk offered the convicted felon a \$10,000 incentive bonus on top of his \$52,000 fee IF he provided VERIFIED information of "nefarious conduct" by Mr. Unsworth. The bonus was never paid because no such evidence exists.	P: <ul style="list-style-type: none">• Relevance• Hearsay		
794 (D)	Lin Wood Tweet: "Musk's lawyer Alex Spiro told Business Insider in a statement: "This case is nothing but a money-grab in which Unsworth has pursued profit and self-promotion at every turn."	P: <ul style="list-style-type: none">• Relevance• Hearsay		
795 (D)	Lin Wood Tweet: "When someone shows you who they are, believe them the first time." - Maya Angelou	P: <ul style="list-style-type: none">• Relevance• Hearsay		
796 (D)	Lin Wood Tweet: British cave diver lashes out at 'thin skinned bully' Elon Musk	P: <ul style="list-style-type: none">• Relevance• Hearsay		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
797 (D)	Lin Wood Tweet: Musk lawyer's comments are simply more accusations of a dishonest Elon Musk defense & PR campaign to demean & falsely attack my client. Since the rescue, Mr. Unsworth has received a total of £2,400 for his assistance in connection with two documentaries about Thai Cave Rescue.	P: <ul style="list-style-type: none">• Relevance• Hearsay		
798 (D)	Lin Wood Tweet: The efforts by Musk's employees to help the kids should be commended even though the tube was not practical. But Musk's personal motives for volunteering their help must be evaluated by jury in context of his need for positive publicity & his efforts to seek it for himself.	P: <ul style="list-style-type: none">• Relevance• Hearsay		
799 (D)	Lin Wood Tweet: Vernon Unsworth spent 2 weeks working daily to save lives of 12 Thai children & coach. Elon Musk spent 3 days trying to generate publicity for Elon Musk from a miraculous rescue made possible by skills, experience, & bravery of genuinely dedicated & involved volunteers. Truth.	P: <ul style="list-style-type: none">• Relevance• Hearsay		
800 (D)	Lin Wood Tweet: For Elon Musk, the Thai Cave Rescue was about PR & his image. For Vernon Unsworth, it was about saving the lost children & their coach.	P: <ul style="list-style-type: none">• Relevance• Hearsay		
801 (D)	Lin Wood Tweet: Wonder if China will be amenable to Elon Musk PR demands? And Musk lawyer again attacks Vernon for receiving total of £2,400 for his assistance in connection with 2 documentaries but does not deny Musk's wrongdoing.	P: <ul style="list-style-type: none">• Relevance• Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	802 (D)	Lin Wood Tweet: As a prepare for summary judgment hearing today in LA in Vernon Unsworth v. Elon Musk, the news of our team's huge win in Covington, KY reaffirms my career—long belief that our system of justice works. Nicholas Sandmann deserves his day in court against WaPo. Now he will get it.	P: <ul style="list-style-type: none">• Relevance• Hearsay		
3	803 (D)	Lin Wood Tweet: Elon Musk to face defamation trial over Thai cave 'pedo guy' comments	P: <ul style="list-style-type: none">• Relevance• Hearsay		
4	804 (D)	Lin Wood Tweet: The truth is incontrovertible. Malice may attack it, ignorance may deride it, but in the end, there it is. - Winston Churchill	P: <ul style="list-style-type: none">• Relevance• Hearsay		
5	805 (D)	Lin Wood Tweet: "We look forward to the trial," Alex Spiro, an attorney for Musk, said in a statement provided to Bloomberg. "We understand that, while Musk has apologized, Unsworth would like to milk his 15 minutes of fame."	P: <ul style="list-style-type: none">• Relevance• Hearsay		
6	806 (D)	Lin Wood Tweet: When you ask to be sued & law & facts are dead against you & you have lost every motion to dismiss case after lawsuit filed, beat on the PR table & continue to insult Vernon Unsworth. Will be very interesting to see how a jury reacts to Elon Musk defense strategy.	P: <ul style="list-style-type: none">• Relevance• Hearsay		
7	807 (D)	Vernon Unsworth Instagram: Front page	P: <ul style="list-style-type: none">• Relevance• Hearsay		
8	808 (D)	BBC ພົມ ນັນທຶນກ ວົງຈະສົມທຽ... - ບົນຊີໄທ - BBC Thai (Transcript)	P: <ul style="list-style-type: none">• Authentication		
9	809 (D)	Ben Reymenants photo	P: <ul style="list-style-type: none">• Relevance• Authentication• Waste of Time		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
810 (D)	Cave Map			
811 (D)	Cave Rescue Hazards Map			
812 (D)	Craig Challen photo	P: <ul style="list-style-type: none">• Relevance• Authentication• Waste of Time		
813 (D)	Detailed Cave Map			
814 (D)	Diving Kids Out Image	P: <ul style="list-style-type: none">• Hearsay		
815 (D)	Document in Thai	P: <ul style="list-style-type: none">• Relevance		
816 (D)	Ex. 13 Vernon Unsworth 7/13/18 CNN Interview (Transcript)	P: <ul style="list-style-type: none">• Cumulative		
817 (D)	Ex. 14 Vernon Unsworth 7/13/18 CNN Interview (Transcript)	P: <ul style="list-style-type: none">• Cumulative		
818 (D)	Ex. 24 Vernon Unsworth 7/16/18 Time Interview (Transcript)	P: <ul style="list-style-type: none">• Cumulative		
819 (D)	Ex. 26 Vernon Unsworth 7/17/18 AFP Interview (Transcript)	P: <ul style="list-style-type: none">• Cumulative		
820 (D)	Ex. 29 Vernon Unsworth 12/27/18 BBC Interview (Transcript)	P: <ul style="list-style-type: none">• Relevance• Cumulative		
821 (D)	GoFundMe page for Saman Kunan	P: <ul style="list-style-type: none">• Relevance		
822 (D)	Governor Narongsak Osothanakorn photo	P: <ul style="list-style-type: none">• Relevance• Authentication• Waste of Time		
823 (D)	John Volanthen photo	P: <ul style="list-style-type: none">• Relevance• Authentication• Waste of Time		
824 (D)	Major Saman Gunan photo	P: <ul style="list-style-type: none">• Relevance• Authentication		
825 (D)	PPTV เปิดใจ “เวรน อนสเวรธ” กัญแจสากัญการกจชวย 13 ชวต - เขมข่าวค่า (Transcript)	P: <ul style="list-style-type: none">• Authentication		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	826 (D)	Richard Harris photo	P: <ul style="list-style-type: none">• Relevance• Authentication• Waste of Time		
3	827 (D)	Rick Stanton photo	P: <ul style="list-style-type: none">• Relevance• Authentication• Waste of Time		
4	828 (D)	Ryan Mac photo	P: <ul style="list-style-type: none">• Relevance• Authentication• Waste of Time		
5	829 (D)	Submarine Diagram, Submarine, Submarine Instructions	P: <ul style="list-style-type: none">• Hearsay• Cumulative		
6	830 (D)	Submarine photos			
7	831 (D)	Texts between Will Heltsley and Armor Harris	P: <ul style="list-style-type: none">• Hearsay• Cumulative		
8	832 (D)	Thanet Natisri photo	P: <ul style="list-style-type: none">• Relevance• Authentication• Waste of Time		
9	833 (D)	The Legal 500: Howard Kennedy LLP	P: <ul style="list-style-type: none">• Relevance• Hearsay• Prejudice		
10	834 (D)	The Legal 500: UK, London - TMT (technology, media and telecoms); Media and entertainment (including media finance); Law firm and leading lawyer rankings	P: <ul style="list-style-type: none">• Relevance• Hearsay• Prejudice		
11	835 (D)	Tik Dating Profile (English translation)	P: <ul style="list-style-type: none">• Authentication• Relevance• Hearsay• Prejudice		
12	836 (D)	Tik Dating Profile (Thai)	P: <ul style="list-style-type: none">• Authentication• Relevance• Hearsay• Prejudice		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	837 (D)	Urban Dictionary definition	P: <ul style="list-style-type: none">• Relevance• Hearsay• Prejudice		
3	838 (D)	Urban Dictionary definition	P: <ul style="list-style-type: none">• Relevance• Hearsay• Prejudice		
4	839 (D)	Vernon Unsworth and Tik photo	P: <ul style="list-style-type: none">• Relevance		
5	840 (D)	Vernon Unsworth and Tik photo	P: <ul style="list-style-type: none">• Relevance		
6	841 (D)	Vernon Unsworth and Tik photo	P: <ul style="list-style-type: none">• Relevance		
7	842 (D)	Vernon Unsworth photo			
8	843 (D)	Vernon Unsworth photo			
9	844 (D)	Vernon Unsworth photo			
10	845 (D)	Vernon Unsworth photo			
11	846 (D)	Vernon Unsworth photo			
12	847 (D)	Vernon Unsworth photo			
13	848 (D)	Vernon Unsworth photo			
14	849 (D)	Wild Boars photo			
15	850 (D)	Woranan Ratrawiphukkun photo	P: <ul style="list-style-type: none">• Relevance• Waste of Time		
16	851 (D)	Chat transcript between Aaron and Chris Bowman	P: <ul style="list-style-type: none">• Hearsay		
17	852 (D)	Chat transcript between Daniel Le and Chris Bowman	P: <ul style="list-style-type: none">• Hearsay		
18	853 (D)	Chat transcript between Vernon Unsworth and Dr. Harry	P: <ul style="list-style-type: none">• Relevance		
19	854 (D)	Chat transcript between Vernon Unsworth and John Volanthen	P: <ul style="list-style-type: none">• Relevance		
20	855 (D)	Chat transcript between Vernon Unsworth and Martin Ellis	P: <ul style="list-style-type: none">• Relevance		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	856 (D)	Chat transcript between Vernon Unsworth and Matt Gutman	P: • Relevance		
3	857 (D)	Chat transcript between Vernon Unsworth and Phil Collett	P: • Relevance		
4	858 (D)	Chat transcript between Vernon Unsworth and Rick Stanton	P: • Relevance		
5	859 (D)	Chat transcript between Vernon Unsworth and Thanet Natisri	P: • Relevance		
6	860 (D)	Chat transcript of Thailand Ground Team	P: • Hearsay • Cumulative		
7	861 (D)	Chat transcript of Thailand Ground Team	P: • Hearsay • Cumulative		
8	862 (D)	Complete Vernon Unsworth Chat History	P: • Relevance • Cumulative		
9	863 (D)	Text messages between Vernon Unsworth and Vanessa Unsworth	P: • Completeness		
10	864 (D)	Text messages between Vernon Unsworth and Vanessa Unsworth	P: • Completeness		
11	865 (D)	Chat transcript between Vernon Unsworth and Derek Anderson	P: • Relevance		
12	866 (D)	Chat transcript between Vernon Unsworth and Thanet Natisri	P: • Relevance		
13	867 (D)	Document in Thai (Translation)	P: • Relevance • Authentication (Incomplete, reserving additional objections)		
14	868 (D)	A summary of the Tham Luang Rescue	P: • Hearsay		
15	869 (D)	Article: Australian divers Richard Harris and Craig Challen return to scene of dramatic Thai cave soccer team rescue	P: • Hearsay • Relevance		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
870 (D)	Liam Cochrane Tweet: In a stunning revelation, British caver Vern Unsworth says the #Thai Wild Boars football team was not trapped at 'Nerm Nom Sai' but we're at 'Pattaya Beach' all along. Mr Unsworth went in last month to help clear Tham Luang of silt. #Thailand 1/2	P: <ul style="list-style-type: none">• Hearsay• Relevance		
871 (D)	Liam Cochrane Tweet: Vern Unsworth told the ABC: "Nerm Nom Sao doesn't exist, it's a figment of some journalist's imagination." If true, this would contradict the official account, every doco and every book (including mine!) A-Thailand 2/2	P: <ul style="list-style-type: none">• Hearsay• Relevance		
872 (D)	Ex. 33 translation certification	P: <ul style="list-style-type: none">• Hearsay• Authentication• Foundation• Prejudice• Hearsay		
873 (D)	Ex. 55 translation certification	P: <ul style="list-style-type: none">• Hearsay• Authentication• Foundation• Prejudice• Hearsay		
874 (D)	Declaration of Jessica Probus	P: <ul style="list-style-type: none">• Relevance		
875 (D)	The BuzzFeed News Standards And Ethics Guide	P: <ul style="list-style-type: none">• Relevance• Prejudice• Confusion• Misleading		
876 (D)	Lin Wood Tweet: @elonmusk should check his mail before tweeting	P: <ul style="list-style-type: none">• Relevance• Hearsay		
878 (D)	Cave Map	P: <ul style="list-style-type: none">• Hearsay		
879 (D)	Article: Rainfall threat forces plan rethink	P: <ul style="list-style-type: none">• Hearsay		
880 (D)	Texts between Elon Musk and Zach	P: <ul style="list-style-type: none">• Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	881 (D)	Texts between Elon Musk and Bryn	P: • Hearsay		
3	882 (D)	Texts between Elon Musk and Scott P.	P: • Hearsay		
4	883 (D)	Texts between Elon Musk and Antonio G.	P: • Hearsay		
5	884 (D)	Texts between Elon Musk and Steve Davis	P: • Hearsay		
6	885 (D)	Texts between Elon Musk and Amor Harris	P: • Hearsay		
7	886 (D)	Texts between Elon Musk and Sam Teller	P: • Hearsay		
8	887 (D)	Texts between Elon Musk and Sam Teller	P: • Hearsay		
9	888 (D)	Texts between Elon Musk and Jared L.	P: • Hearsay		
10	889 (D)	Texts between Elon Musk and Sam Teller	P: • Hearsay		
11	890 (D)	Texts between Elon Musk and Amor Harris	P: • Hearsay		
12	891 (D)	Texts between Elon Musk and Amor Harris	P: • Hearsay		
13	892 (D)	Texts between Elon Musk and Sarah O.	P: • Hearsay		
14	893 (D)	Texts between Elon Musk and David Arnold	P: • Hearsay		
15	894 (D)	Texts between Elon Musk and David Arnold	P: • Hearsay		
16	895 (D)	Texts between Elon Musk and Amor Harris	P: • Hearsay		
17	896 (D)	Ex. 53 translation certification	P: • Relevance • Authentication • Foundation • Prejudice • Hearsay		
18	897 (D)	Twitter profile @llinwood	P: • Hearsay • Relevance • Prejudice		
19	898 (D)	Twitter profile @marksricks	P: • Hearsay • Relevance • Prejudice		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	899 (D)	Twitter profile @RMac18	P: <ul style="list-style-type: none">• Hearsay• Relevance		
3	900 (D)	Twitter profile @yoda	P: <ul style="list-style-type: none">• Hearsay• Relevance		
4	901 (D)	Vernon Unsworth Photo	P: <ul style="list-style-type: none">• Relevance		
5	902 (D)	YouTube video Return to the Tham Luang cave video	P: <ul style="list-style-type: none">• Relevance		
6	902A (D)	Screen grab of credits to YouTube video Return to the Tham Luang cave video	P: <ul style="list-style-type: none">• Objection¹		
7	903 (D)	You Tube video Vern Unsworth is considering legal action	P: <ul style="list-style-type: none">• Objection		
8	903A (D)	Excerpt of You Tube video Vern Unsworth is considering legal action	P: <ul style="list-style-type: none">• Objection		
9	904 (D)	You Tube Miracle at Tham Luang Caves	P: <ul style="list-style-type: none">• Objection		
10	905 (D)	Theresa May Photo	P: <ul style="list-style-type: none">• Objection		
11	906 (D)	Email from Vernon Unsworth to Mark Stephens re Thoughts from Bangkok	P: <ul style="list-style-type: none">• Objection		
12	907 (D)	Email from William Robinson to Vernon Unsworth re PDF FILES for all 3 articles written	P: <ul style="list-style-type: none">• Objection		
13	908 (D)	Article: Thai Girlfriend of British Diver Vern Unsworth Says Elon Musk's Pedophile Accusation is Laughable	P: <ul style="list-style-type: none">• Objection		
14	909 (D)	Article: British cave diver Vernon Unsworth to sue Elon Musk after new rant	P: <ul style="list-style-type: none">• Objection		
15	910 (D)	Article: Thai cave rescue hero could sue Elon Musk in three countries over 'child rapist' slurs	P: <ul style="list-style-type: none">• Objection		

¹ Plaintiff objects to Exhibits 902A through 933 on the grounds that they were added to Defendant's exhibit list and submitted to Plaintiff at 10:37 pm on December 2, the night before trial. Plaintiff has not had an opportunity to review these newly proposed exhibits, and Plaintiff reserves his right to lodge substantive objections to these untimely exhibits if the Court determines that Defendant is entitled to use them at trial.

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	911 (D)	Article: ENTOMBED! Twelve schoolboys trapped deep inside a flooding cave in a drama that gripped the world – as relived in new book by reporter who witnessed every moment	P: <ul style="list-style-type: none">• Objection		
3	912 (D)	Article: 'It was utter chaos': Inside the Thai cave rescue that nearly didn't happen	P: <ul style="list-style-type: none">• Objection		
4	913 (D)	Email from Vernon Unsworth to Adam Fellows re Watch "Elon Musk's fall from grace after calling British cave rescue diver a 'paedo'" on YouTube	P: <ul style="list-style-type: none">• Objection		
5	914 (D)	The British Divers at the Centre of the Thai Cave Rescue (Video)	P: <ul style="list-style-type: none">• Objection		
6	915 (D)	Elon Musk Tweet: When the zombie apocalypse happens, you'll be glad you bought a flamethrower. Works against hordes of the undead or your money back!	P: <ul style="list-style-type: none">• Objection		
7	916 (D)	Elon Musk Tweet: As I've said before, I am definitely a Martian	P: <ul style="list-style-type: none">• Objection		
8	917 (D)	Elon Musk Tweet: Headed to a (ahem) volcano caldera. Since I didn't finish my PhD, it's actually "Mr." Evil.	P: <ul style="list-style-type: none">• Objection		
9	918 (D)	Elon Musk Tweet: It's much easier to do the CGI that way	P: <ul style="list-style-type: none">• Objection		
10	919 (D)	Elon Musk Tweet: The actual amount of time I spend on Twitter is tiny. My tweets are literally what I'm thinking at the moment, not carefully crafted corporate bs, which is really just banal propaganda.	P: <ul style="list-style-type: none">• Objection		
11	920 (D)	Elon Musk Tweet: Heading back into the factory, so that's enough for now. Don't take my Tweet too seriously. For one thing, it's called a "Tweet".	P: <ul style="list-style-type: none">• Objection		
12	921 (D)	Article: Thai cave boys and rescuers feted by prime minister at gala reception	P: <ul style="list-style-type: none">• Objection		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	922 (D)	Tham Luang Cave Rescue: Against the Elements (Video)	P: • Objection		
3	922A (D)	Excerpt of Tham Luang Cave Rescue: Against the Elements (Video)	P: • Objection		
4	923 (D)	Email from Mark Stephens to David Hooper, Lin Wood, Taylor Wilson, Hugo Mason re Vernon Unsworth's case	P: • Objection		
5	924 (D)	Email from Charles Withers to James Brickhouse re FreedomCity.com	P: • Objection		
6	925 (D)	Email from GoDaddy to James Brickhouse re Shop and save 40%. It's on us	P: • Objection		
7	926 (D)	Email from Jim Medalia to to James Brickhouse re justballs.com	P: • Objection		
8	927 (D)	Jim Jansen Chart	P: • Objection		
9	928 (D)	Rick Stanton gives incredible account of Thai cave rescue (Video)	P: • Objection		
10	929 (D)	Email from Matt Gutman to Vernon Unsworth re Big Passage Video - Tham Luang Monks Series	P: • Objection		
11	930 (D)	Email from Matt Gutman to Vernon Unsworth re Updated Cave Maps - Tham Luang	P: • Objection		
12	931 (D)	Email from James Brickhouse to Yousef Ben Atiga re Please read my message I don't want to die	P: • Objection		
13	932 (D)	Email from Jared Birchall to James Brickhouse re Test	P: • Objection		
14	933 (D)	Email from Ryan Mac to Elon Musk Re: Buzzfeed News: Unsworth legal letter	P: • Objection		